

I hereby give notice that a hearing by commissioners will be held on:

Date: Monday 6 - Friday 10 September 2021
Time: 9.30AM
Venue: TO BE CONFIRMED

PRIVATE PLAN CHANGE 51
HEARING REPORT
DRURY 2 PRECINCT
KARAKA AND DRURY LIMITED

COMMISSIONERS

Chairperson Greg Hill
Commissioners Karyn Kurzeja
Mark Farnsworth

Sam Otter
SENIOR HEARINGS ADVISOR

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WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual hearing procedure is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The applicant** will be called upon to present their case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
 - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- **The applicant** or their representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

Please note

- that the hearing will be audio recorded and this will be publicly available after the hearing
- catering is not provided at the hearing.

A NOTIFIED PRIVATE PLAN CHANGE TO THE AUCKLAND UNITARY PLAN BY KARAKA AND DRURY LIMITED

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Reporting officer, Emily Buckingham, Planner

Reporting on a proposed private plan modification rezone 33.65 hectares of land in Drury West from Future Urban to 15.29 hectares of Business: Town Centre, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings and 4.61 hectares of Residential: Residential: Mixed Housing Urban at Drury 2 Precinct

APPLICANT: KARAKA AND DRURY LIMITED

SUBMITTERS:	
Page 281	Jennifer Catherine Joyce
Page 283	Yu Wang
Page 285	Fire and Emergency New Zealand c/ Beca Ltd Eloise Taylforth
Page 290	God Save The Flag Ltd c/ Wendy Hannah
Page 293	Rachel and Michael Gilmore
Page 295	Britmat Holdings Ltd c/ Integrated Planning Solutions Ltd c/- Paul Sousa
Page 298	First Gas Limited c/- Zane Wood
Page 304	The Catholic Diocese of Auckland c/- Matt Feary
Page 307	Adam Yates
Page 309	Spark New Zealand Trading Limited c/- Fiona Matthews
Page 321	Lomai Properties Limited c/- Bill Loutit & Simpson Grierson
Page 323	Karaka & Drury Consultant Ltd c/- Wendy Jao
Page 325	Barfilon Investment Ltd c/- Wendy Jao
Page 327	DL & WJ Ltd c/- Wendy Jao
Page 329	Noah Eastern Limited c/- Wendy Jao
Page 345	Wendy Jao
Page 347	L & W Rising Ltd
Page 349	New Elite Investment Ltd c/- Jing Chen
Page 351	Wang Wensheng
Page 353	Huawei Development Ltd c/- Wei Pan
Page 355	Edison Yi
Page 357	Xibiny Chen
Page 359	Jal Glory investment Ltd c/- Hongyan zhao
Page 361	Jia Liu
Page 363	Bremner Estates Development Limited c/- William Zhang
Page 365	Auranga Resident's Association
Page 367	Jonxiang Chen
Page 369	Charles Ma
Page 372	Andrew Daken
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Page 380	Marmitmor Limited
Page 382	Watercare Services Limited c/- Ilze Goteli
Page 388	Ngāti Te Ata Waiohua c/-Bill Loutit & Simpson Grierson
Page 392	Ministry of Housing and Urban Development c/- Ernst Zollner
Page 398	Auckland Council c/- Christopher Turbott
Page 418	Waka Kotahi c/- Brendan Clarke

Page 428	Elly S Pan c/- Nigel Hosken
Page 432	Counties Power Limited c/- Jo Michalakakis
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Page 482	Heritage New Zealand Pouhere Taonga c/- Susan Andrews
Page 488	Drury South Limited c/- Lauren Eaton
Page 491	Kāinga Ora Homes and Communities c/- Michael Campbell
Page 505	Ngāti Tamaoho Trust c/- Lucie Rutherford

FURTHER SUBMITTERS:

Page 521	The Catholic Diocese of Auckland
Page 525	Yu Wang
Page 539	Auckland Council c/- Christopher Turbott
Page 549	Oyster Capital c/o Barker & Associates
Page 555	Kiwi Property c/o Barker & Associates
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Hearing Report for Proposed Plan Change 51: Drury 2 Precinct to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

Report to: Hearing Commissioners

Hearing Date/s: 6-10 September 2021

File Reference S42A report, PPC51

Report Author Emily Buckingham, Consultant Planner

Report Approvers Craig Cairncross, Team Leader Central South

Report produced 6 August 2021

Summary of Proposed Plan Change 51: Drury 2 Precinct

Plan subject to change	Auckland Unitary Plan (Operative in part), 2016
Number and name of change	Proposed Plan Change 51 – Drury 2 Precinct to the Auckland Unitary Plan
Status of Plan	Operative in part
Type of change	Private plan change
Committee date of approval (or adoption) for notification	12 August 2020
Parts of the Auckland Unitary Plan affected by the proposed plan change	<ul style="list-style-type: none"> • Chapter I Precincts – new precinct added • Planning maps – zones, precinct boundary, Stormwater Management Area Flow 1 Control, Height Variation Control
Date draft proposed plan change was sent to iwi for feedback	Not sent pre-notification
Date of notification of the proposed plan change and whether it was publicly notified or limited notified	27 August 2020, publicly notified
Plan development process used – collaborative, streamlined or normal	Normal
Submissions received (excluding withdrawals)	44
Date summary of submissions notified	11 December 2020
Number of further submissions received (numbers)	14
Legal Effect at Notification	No
Main issues or topics emerging from all submissions	<ul style="list-style-type: none"> • Support for plan change as it promotes sustainable management; achieves purpose of RMA • Concerns that the proposed zoning and density for the area is somewhat dependent on the location of the future Drury West rail station • Whether the Business – Town Centre zone is appropriate • Concerns around the funding and timing of infrastructure upgrades required to support urbanisation of this site • Amendments to the precinct plan sought to elements like road layout and typologies, intersections, and parks • Detailed comments on the transport-related provisions • Width/planting of riparian margins

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Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
AEE	Assessment of Environmental Effects
AEP	Annual Exceedance Probability
AUP	Auckland Unitary Plan (Operative in Part)
BLC	Business: Local Centre Zone
BTC	Business: Town Centre Zone
CIA	Cultural Impact Assessment
FTN	Frequent Transit Network
FULSS	Auckland Council Future Urban Land Supply Strategy 2017
FUZ	Future Urban Zone
GFA	Gross Floor Area
ITA	Integrated Transport Assessment
KDL	Karaka and Drury Limited (the requestors for this plan change)
LTP	Auckland Council Long Term Plan (10 Year Budget)
LVEA	Landscape and Visual Effects Assessment
MHU	Residential: Mixed Housing Urban zone
NDC	Auckland Council Stormwater Network Discharge Consent
NES-CS	National Environmental Standard on Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-FW	National Environmental Standards for Freshwater 2020
NoR	Notice of Requirement
NPS-FM	National Policy Statement on Freshwater Management 2020
NPS-UD	National Policy Statement for Urban Development 2020
NZUP	New Zealand Upgrade Programme
PPC51	Proposed Private Plan Change 51
RLTP	Regional Land Transport Plan
RMA	Resource Management Act 1991
RPS	Regional Policy Statement
RTN	Rapid Transit Network
SEA	Significant Ecological Area
SGA	Te Tupu Ngātahi / Supporting Growth Alliance
SH1	State Highway 1

SH22	State Highway 22 / Karaka Road
SMAF1	Stormwater Management Area Control – Flow 1
SMP	Stormwater Management Plan
THAB	Residential: Terrace Housing and Apartment Buildings zone
UDA	Urban Design Assessment

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EXECUTIVE SUMMARY

1. Proposed Private Plan Change 51: Drury 2 Precinct (PPC51) to the Auckland Unitary Plan is a private plan change request from Karaka and Drury Limited (the requestor) which seeks to rezone 33.65 hectares of land located around Burberry Road, Drury, from Future Urban zone to:
 - 15.29ha of Business: Town Centre (BTC) zone (with 27m Height Variation Control);
 - 13.75ha of Residential: Terrace Housing and Apartment Buildings (THAB) zone; and
 - 4.61ha of Residential: Mixed Housing Urban (MHU) zone.
2. The request also seeks to introduce a new Drury 2 Precinct, with plans showing a realigned Burberry Road, new east-west collector road, town centre, local roads and retention of an existing lake feature. Approximately 890 dwellings and 670 jobs may be accommodated by the request.
3. The normal plan change process set out in Schedule 1 of the Resource Management Act 1991 ('RMA') was adhered to in the processing of PPC51. The plan change request was notified for public submissions on 27 August 2020 with 44 submissions received. One original submission was late, with a waiver granted to accept the submission. The Summary of Decisions Requested was notified for further submissions on 11 December 2020. 14 further submissions were received before the closing date of 29 January 2021.
4. The discussion and recommendations in this report are intended to assist the Hearing Commissioners, and those persons or organisations that lodged submissions on PPC51. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
5. The urbanisation of the PPC51 land is consistent with the Council's Future Urban Land Supply Strategy, which identifies this area to be development-ready from 2022. However, at the time of the plan change request there remained some uncertainties over the funding, timing and location of supporting infrastructure for the Drury West area, including the Drury West Train Station and State Highway 22 upgrade.
6. **NOTE:** Following expert conferencing, the requestor is preparing an updated Integrated Transport Assessment (ITA) which is to address the differing circumstances since the plan change was lodged, as well as updated planning provisions in response to this and various other submitter concerns. However, this information was not able to be addressed in this report due to it being received shortly before publication. Due to this, the transport assessment in this report (in particular) is subject to change. The ITA will inform infrastructure upgrades required before the PPC51 land can be urbanised, and these will likely include improvements to State Highway 22 / Karaka Road between Jesmond Road and the State Highway 1 Drury Interchange.
7. Not all of the infrastructure upgrades expected to be required to support the urbanisation of the Drury West area are currently funded. The establishment of new train stations at Drury West and Drury Central, the electrification of the rail line between Papakura and Pukekohe, upgrades to State Highway 1 between Drury and Papakura, and local infrastructure investment in the Drury network including active modes and public transport are to be funded by the NZ Upgrade Programme. Additionally, route protection for an upgrade to State Highway 22 and future Frequent Transit Network links to the west and north of the PPC51 area is underway via Notices of Requirement. The Long Term Plan and Regional Land Transport Plan make allocations towards these works. While a complete funding package is not in place, I have assessed that there is enough surety that

these projects will be delivered in the medium term for a rezoning decision to proceed. To address the risk that the State Highway 22 upgrade is not delivered in the short term, my recommended precinct provisions require the upgrade of State Highway 22 to an urban standard, including four lanes and provision of active transport linkages, to be in place prior to any occupation of buildings within the precinct.

8. The plan change proposes that the subject land be the location of the primary town centre for Drury West. However, since the plan change request was developed, KiwiRail has proposed that the Drury West train station be located further south (now approx. 1,300m walking distance from the centre of the proposed town centre zone, and requiring travel along State Highway 22, which currently has no footpaths). Assuming that this is indeed the final location for the station, and noting that future frequent bus routes are also over 500m away, it is my view that the PPC51 land is not suitable for the primary Drury West town centre. This view stems from my assessment that the proposed town centre is not well integrated with public transport infrastructure provision.
9. I have assessed that the proposed Business: Town Centre zone, whilst generally located within the area indicated for a centre on the Drury-Opāheke Structure Plan, does not give effect to Chapter B2 of the Auckland Unitary Plan Regional Policy Statement. This is because I consider the town centre's separation from public transport provision (distance, compounded by the absence of safe active transport facilities for that distance) has a material impact on whether the town centre:
 - has a safe and efficient transport system which is integrated with the centre;
 - enables better and efficient use of infrastructure, and more effective public transport;
 - can be accessed by people of all ages and abilities;
 - enables greater social and cultural vitality;
 - minimises vehicle movements; and
 - is responsive to the effects of climate change.
10. I consider that the proposed location of the Business: Town Centre zone is not the most appropriate way to achieve the town centre zone objective (H10.2(6)) that town centres are the focus for commercial, community and civic activities for the surrounding (Drury West) area. This is because the attractiveness of the PPC51 location to community and civic activities and certain employment activities is diminished, due to limited public transport integration. An alternative town centre location closer to the future Drury West train station and bus frequent transit network would give the centre the best chance to maximise employment densities, and would be accessible to a greater proportion of the Drury West residents whom community and civic activities would serve.
11. In light of the above, placing the primary town centre for Drury West within the PPC51 area would come at a significant opportunity cost and would compromise the achievement of a comprehensive, sustainable and efficient urbanisation pattern for the wider Drury-Opāheke Structure Plan area (i.e. a pattern that maximises the efficiency of the investment in the Drury West train station, provides good access to services for all sectors of society and minimises the need for vehicle movements).
12. Instead of a town centre, I consider the PPC51 land should potentially contain a smaller Business: Local Centre zone to service the needs of the surrounding residential catchment, with the remainder of the land zoned Residential (THAB and MHU). Alternatively, all of the land could be zoned Residential. However, I understand the requestor continues to seek the notified zoning, including a Business: Town Centre zone.

13. I consider an alternative centre zoning to that sought to be within the scope of submissions. However, an alternative zoning for the centre component involving a smaller business area and a larger residential area has implications for zone extents, open space, transport networks and other elements of urban form. It may also involve amended road layouts to that shown on the proposed precinct plan. These related matters will need to be addressed by the requestor, should my recommendation be accepted.
14. The preferred location of the Drury West train station (and an adjoining town centre) also raises the issue of whether the proposed THAB zoning is appropriate, given the land is outside the walkable catchment of the proposed train station and more than 500m from a frequent bus route. However, some THAB zone around a smaller Business: Local Centre and lake amenity feature is still supportable.
15. Irrespective of the size and zoning of the business area, I recommend several amendments to other precinct provisions to address potential adverse effects on the environment, the key ones being:
 - Additional threshold standards for transport infrastructure required to be in place before buildings are occupied;
 - Additions to precinct plan of key features contributing to a quality urban environment – indicative streams, indicative open space, active transport links, existing amenity plantings;
 - A requirement for ecological surveys, stream surveys, notable trees assessment and lateral spread geotechnical assessment prior to any subdivision and development;
 - Additional assessment criteria for the interface of development with the lake and with State Highway 22;
 - New building materials standard for stormwater quality;
 - Requirement for archaeological assessment prior to riparian planting; and
 - Interior noise standards for residential dwellings in relation to State Highway 22 noise.
16. Based upon the current information, the adverse environmental effects (with the exception of spatial planning and strategic urban design effects) of the plan change can likely be adequately avoided, remedied or mitigated (for the Business: Town Centre zoning as well as any alternative proposal) if the recommended amendments are made.
17. Provided that amendments are made to the proposed zoning and Precinct provisions to address the issues outlined above (and as more fully detailed in Appendix 8), then it is my recommendation that the private plan change request be approved with modifications under clause 29(4)(a) of Schedule 1 of the RMA. However, should the above matters not be resolved in an appropriate manner (that is; in a way that results in provisions that do not give effect to national policy statements and/or the regional policy statement), then I would recommend that the plan change request be declined under clause 29(4)(a) of Schedule 1 of the RMA.

1. BACKGROUND

1.1. Plan Change Purpose

18. Proposed Private Plan Change 51 (PPC51) to the Auckland Unitary Plan (Operative in Part) (AUP) is a private plan change request from Karaka and Drury Limited (KDL, “the requestor”) which seeks to rezone 33.65 hectares of land in Drury West located around Burberry Road, Drury, from Future Urban zone to 15.29ha of Business: Town Centre (BTC) zone; 13.75ha of Residential: Terrace Housing and Apartment Buildings (THAB) zone; and 4.61ha of Residential: Mixed Housing Urban (MHU) zone. It also seeks to introduce a new Drury 2 Precinct. The proposed plan change provisions are attached to this report as **Appendix 1**.
19. The purpose of PPC51, as outlined in the submitted Assessment of Environmental Effects (AEE), is to enable urban residential development to be undertaken in the plan change area. The Drury West centre (approximately 25,000-30,000m² GFA) is to service the Drury West residential population catchment and enable local employment (estimated 667 jobs). The housing (expected number of dwellings is approximately 890) is stated to contribute towards the shortfall in housing supply in the Auckland Region.¹

1.2. Location and Land Ownership

20. A locality map is included as **Figure 1** below (plan change area outlined in red). The requestor owns a large portion of the plan change land area (approximately 40%) at 6 Burberry Road, and there are other properties within the area in private ownership (the requestor has various agreements in place with some of these landowners).

1.3. Existing Environment

21. The requestor has described the land subject to PPC51 and surrounding locality at section 2 of the AEE. I viewed the land from surrounding roads on 25 January 2021.
22. The PPC51 area comprises approximately 33.65 hectares of land in ten parcels and is situated in close proximity to the Southern motorway / Drury interchange. The land directly adjoins the Drury 1 Precinct (Auranga B1) to the north, Ngākoroa Stream to the east, FUZ land to the west and Karaka Road/State Highway 22 (SH22) to the south and south east. Ngākoroa Reserve is located on the opposite side of Karaka Road/SH22. Burberry Road bisects the PPC51 area from the south-east to the north. The edge of the existing Drury township and business area lies approximately 600m to the north-east, on the other side of the southern motorway and Ngākoroa Stream/Drury Creek. The Auckland rail corridor lies to the south of SH22 approximately 120-200m away.
23. The PPC51 area comprises a number of large rural lifestyle landholdings with approximately ten dwellings with associated swimming pools, garages, barns, tennis courts and accessory sheds and buildings. There is also some small scale grazed pastoral land use.

¹ Purpose from Section 3.3 of the PPC51 AEE. Dwelling and job numbers from the Integrated Transport Assessment (Attachment 7 to PPC51). GFA from the Economic Analysis (Attachment 12 to PPC51)



Figure 1: Locality Plan

24. Burberry Road provides access to the site from SH22 and the Drury State Highway 1 motorway intersection and the Ngākoroa Stream bridge (Jesmond Bridge). Burberry Road is currently rural in character being relatively narrow and devoid of kerb and channel, street lighting or footpaths.
25. The land is characterised by flat to rolling pastoral landform, dropping off more steeply to the estuarine riparian edge of Drury Creek to the east and an unnamed tributary stream of Ngākoroa Stream, immediately adjacent to SH22, to the south east. A 1.3ha (approx.) ornamental pond at the southern end of the plan change area is the main freshwater feature within the area. It is also subject to several permanent, intermittent and ephemeral streams. The ultimate receiving environment that the streams discharge to is the Drury Creek, which is a Significant Ecological Area (SEA) – Marine 1 and 2.
26. Pasture covers the majority of the PPC51 area. Vegetation within the area comprises shelterbelt and hedgerow plantings along fence lines and road boundaries, indigenous

and exotic tree species and specimen trees and amenity plantings clustered around existing dwellings.

27. Further features of the plan change area are shown in **Figure 2**, based on Council's GIS information. Streams and estimated floodplains are shown, as well as the First Gas - gas transmission pipeline and the Notice of Requirement for SH22 referred to in section 2.4 below.

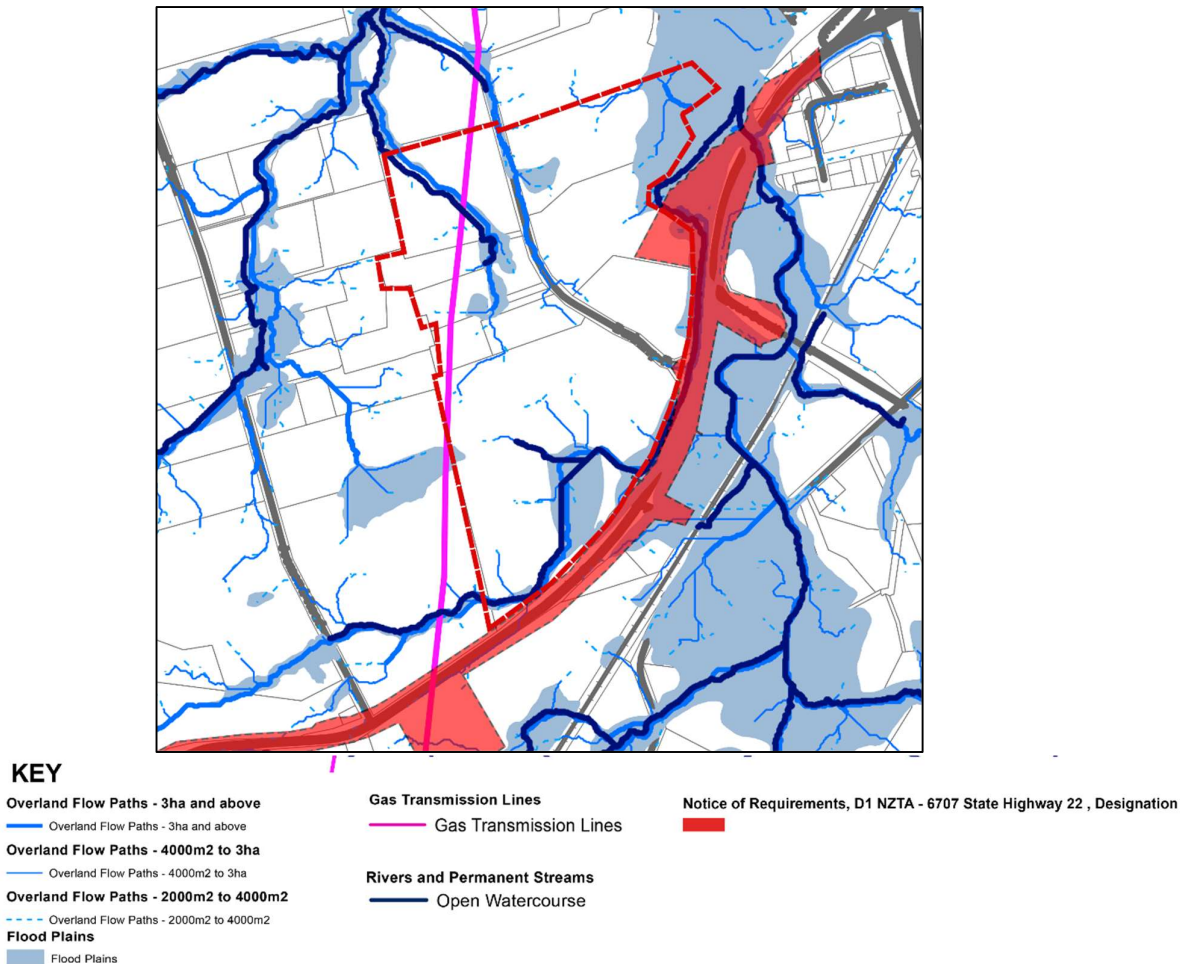


Figure 2: Plan change area features

1.4. Lodged Documents

28. The requestor has provided the following reports and documents to support their request:

Auranga B2 Private Plan Change Request – Planning assessment: Assessment of Environmental Effects (AEE) prepared by Tollemache Consultants Ltd, dated 15 May 2020

Attachment 1: Locality Map

Attachment 2: Records of Title

Attachment 3: Proposed Plan Change provisions, zoning/overlay maps and precinct plan

Attachment 4: Section 32 analysis

Attachment 5: Engineering Infrastructure Report, prepared by Mackenzie&Co, dated May 2020

Attachment 6: Stormwater Management Plan, prepared by Mackenzie&Co, dated 24 April 2020

Attachment 7: Integrated Transport Assessment, prepared by Commute, dated 13 May 2020

Attachment 8: Urban Design Assessment, prepared by Ian Munro, dated May 2020

Attachment 9: Landscape and Visual Effects Assessment, prepared by LA4 Landscape Architects, dated 17 April 2020

Attachment 10: Ecological Values Assessment, prepared by RMA Ecology, dated April 2020

Attachment 11: Geotechnical Report, prepared by Lander Geotechnical, dated 4 March 2019

Attachment 12: Auranga Town Centre Economic Analysis, prepared by Urbacity, dated May 2020

29. These reports can be found in **Appendix 2** to this report.

1.5. Clause 23 Requests for Further Information

30. The private plan change request was lodged with the Council on 19 May 2020. A Clause 23 Request for Further Information was sent to the requestor on 17 June 2020. The purpose of the request was to enable Council to better understand the effects of the plan change on the environment, the ways in which adverse effects may be mitigated, the benefits, costs, efficiency and effectiveness of the plan change and any possible alternatives to the request. The key information sought related to the following matters:

- Planning
- Traffic
- Urban Design and Landscape effects
- Terrestrial ecology
- Freshwater ecology
- Geotechnical
- Stormwater
- Contamination
- Civil engineering

31. Responses to the further information request were provided on 26 June 2020 and 10 July 2020. No modifications were made to the proposal under clause 24 of Schedule 1.

32. The requests for further information and responses are attached in full in **Appendix 3** to this report.

33. The plan change request was accepted by the Council under clause 25(2)(b) of Schedule 1 of the RMA by Council's Planning Committee on 12 August 2020.

2. STRATEGIC CONTEXT

34. This section of the report sets out the strategic context to the plan change request. The section discusses non-statutory documents like the Auckland Plan, the Future Urban Land Supply Strategy and the Drury-Opāheke Structure Plan. It also discusses relevant Notices of Requirement and infrastructure projects. The National Policy Statement on Urban Development 2020, which is a statutory document, is also addressed at a high level.

2.1. Auckland Plan

35. The Auckland Plan 2050 is prepared in accordance with sections 79 and 80 of the Local Government (Auckland Council) Act 2009.
36. In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines quality as:
- 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.
37. The compact aspect of this approach means that:
- future development will be focused within Auckland's urban footprint, with most of that growth occurring in existing urban areas;
 - by 2050, most growth will have occurred within this urban footprint, limiting both expansion into the rural hinterland and rural land fragmentation; and
 - this approach contributes to investment certainty by understanding where and when growth is likely to occur.
38. The Auckland Plan's Development Strategy shows a number of urban expansion areas in the southern sector, including Drury West (the location of the plan change request) – see **Figure 3**.

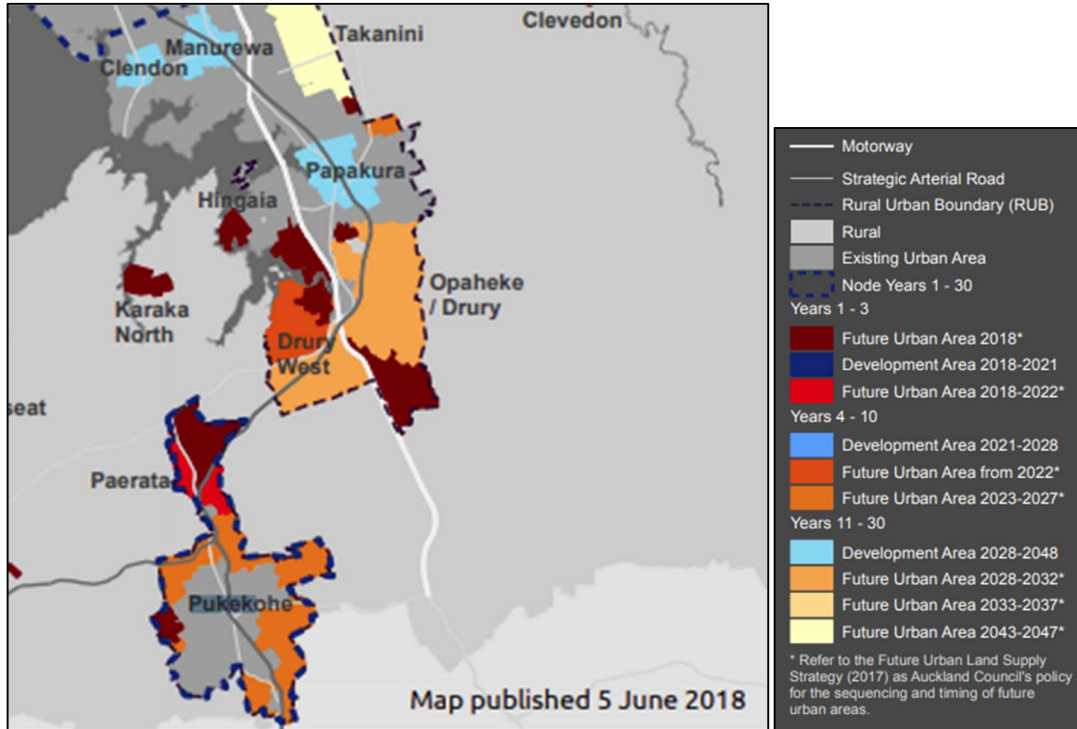


Figure 3: Auckland Plan Development Strategy Map

2.2. Future Urban Land Supply Strategy

39. The Council's Future Urban Land Supply Strategy 2017 (FULSS) sequences the release of future urban land with the supply of infrastructure over 30 years for the entire Auckland region. The FULSS has a regional focus and attempts to provide a sustainable path for greenfields expansion to the north, west and south of the Auckland urban area. The FULSS strategy sits alongside council's (and central government's) aspirations for considerable brownfields redevelopment.
40. The intended staging for growth in Drury-Opāheke set out in the FULSS is:
 - (a) Drury west of SH1 and north of SH22 is to be development ready from 2022 (including this PPC51 area)
 - (b) the remainder of the Drury-Opāheke structure plan area is to be development ready by between 2028 and 2032.
41. In this context development ready means that urban zoning and bulk infrastructure is provided.
42. The FULSS (and the Structure Plan Guidelines of the Auckland Unitary Plan) seek that structure planning that occurs in accordance with the timing of the FULSS will be accompanied by a funding plan that is co-ordinated with the timing of rezonings. The funding plan will see funding commitments made in the Council's Long Term Plan, the Regional Land Transport Plan and where relevant, Development Contributions policy. This is to ensure infrastructure is co-ordinated with development.
43. The plan change request, if made operative, would result in development occurring in line with the 'from 2022' timing set out in the FULSS.
44. The Drury area is one part of a wider programme of facilitating managed urban expansion. In the first decade of the Auckland Plan's 30-year time horizon, the FULSS identifies a capacity of 22,000 dwellings in greenfields growth areas of Warkworth North, Paerata, Whenuapai Stage 1, Drury West Stage 1, Pukekohe and Cosgrave Road Takanini.
45. The 22,000 dwellings to be enabled in decade one comes on top of capacity which is already live zoned. For example, in the south this includes the Bremner Road Special Housing Area (1,350 dwellings); Wesley (Paerata) (4,550 dwellings); and Belmont (800 dwellings) areas. Large areas are also being urbanised in Redhills and Wainui in the north-west and north of the region (areas that were live zoned during the AUP development process).
46. In the Drury area, in 2016 the Council approved a plan change request by Karaka and Drury Limited to rezone 84.6 hectares of land in a Special Housing Area at Bremner Road (Auranga A). In 2018 a plan change request by KDL to rezone an additional 83 hectares of land adjacent to Auranga A was approved. Together these areas form Drury 1 precinct in the AUP, where approximately 2,650 dwellings are anticipated. The FULSS anticipates up to 5,500 dwellings in total in the Drury West Stage 1 area north of SH22, and 5,700 dwellings in Drury West Stage 2 south of SH22 (with a timing of 2028-2032). It also notates one town and two local centres for Drury West.

2.3. Drury-Opāheke Structure Plan

47. The Council's Drury-Opāheke Structure Plan, adopted in August 2019, sets out a pattern of land use and a network of infrastructure for the Future Urban zoned land at Drury and Opāheke (1,921ha). The structure plan is intended to be the foundation to inform future

plan changes to rezone the land, and is a requirement under the AUP before Future Urban zoned areas can be urbanised and 'live' zoned.

48. The structure plan land use map indicates a substantial centre at Drury East, a smaller centre at Drury West and large areas of housing to the east and west of the motorway. A substantial area of light industrial land is shown along the western side of SH1 around Great South Road. Over 30 years the structure plan is estimated to provide room for about 22,000 houses and 12,000 jobs, with a build out population of about 60,000.
49. The land use zonings proposed in PPC51 are largely consistent with the land use pattern set out in the structure plan (see **Figure 4** below); however the train station location indicated is not the most recent preferred location (see section 2.4 below) – consistent with the notation on the legend that the location may change. The structure plan land use map shows a non-specific 'centre' zoning over the southern portion of the plan change site, where BTC zone is sought to be applied. This is referred to in the structure plan text as the 'western centre'.

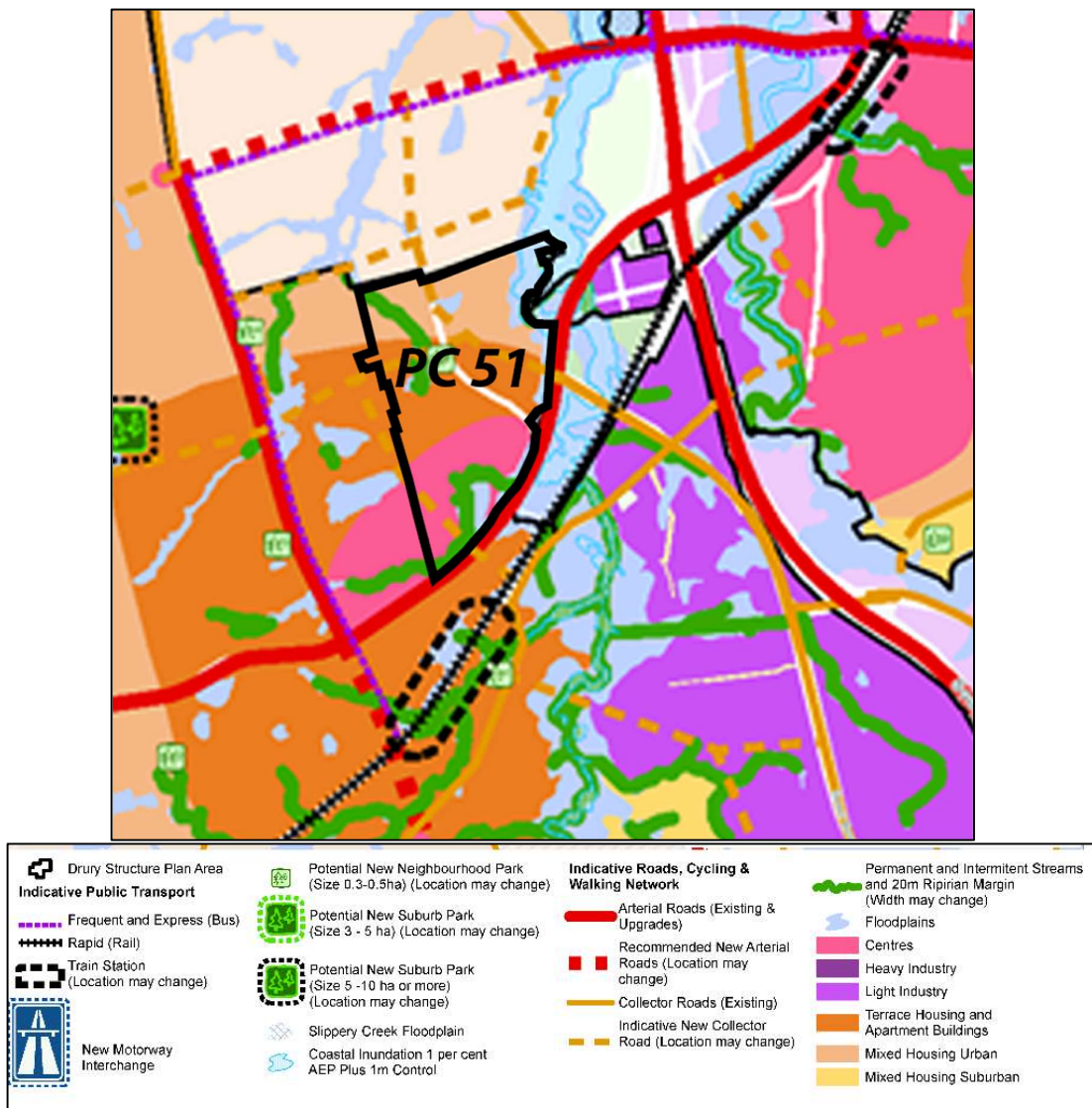


Figure 4: Drury-Opāheke Structure Plan excerpt

50. Section 3.13.2 of the structure plan states that the western centre and its surrounding high-density residential area should be located, sized, designed, zoned and serviced to:

- *serve the needs of the future population of the western half of the Drury – Opāheke structure plan area as it grows over time in conjunction with other centres in that area*
- *provide for high densities aiming to achieve at least 110 persons per hectare within a walkable distance of the railway station*
- *provide high job numbers, particularly close to the station and FTN, but elsewhere as well*
- *be adjoining SH 22 between Jesmond Road and Burberry Road*
- *provide for vertical mixed-use, i.e. business on the ground floor and residential above between SH 22 and the station*
- *ensure that residents will be able to access all the services and facilities they need within no more than 10 minutes' walk*
- *provide an attractive, well-connected, walkable street environment with emphasis on pedestrian and cycle connectivity to the:*
 - *centre core*
 - *station,*
 - *FTN route,*
 - *surrounding residential areas*
 - *industrial business areas to the east*
 - *provide for community and social infrastructure*
 - *provide for affordable housing*
 - *provide an attractive mixed-use urban environment with a high standard of design*
 - *promote the cultural and heritage values of the area*
 - *protect and enhance the blue-green network that supports the area including through water sensitive design, tree planting, parks, greenways and riparian enhancement margins*
 - *promote a high standard of design along the margins of the Hingaia Stream and tributaries including avoiding bulky building close to the stream*
 - *avoid urban development in the 1 in 100-year floodplain.*

51. The structure plan also explains some of the reasoning behind the centres layout in Drury West. In section 4.3.7.2 it states that the centres are depicted as generalised locations, recognising that more detailed work will need to be undertaken at the plan change stage to determine their exact location, extent and zoning. This provides flexibility to adjust their provision in accordance with increased knowledge from the outcomes of plan change investigations and further infrastructure and staging investigations. Section 4.3.7.2 then states that the western centre location:

“recognises the current direction of urban growth from north to south and can service that growth by providing for centre development nearby, and with, in time, access to both a railway station and FTN bus service within walking distance. This location also has good commercial and job creation potential as a result of visibility to traffic on SH 22, and proximity to proposed industrial business areas.

Choice of this western centre locations is preferred over alternative locations to the south of SH 22 recognising that areas to the south of SH 22 are not scheduled for growth soon. Alternative western centre location options further to the west in the structure plan area were also evaluated. However, these alternative locations are also in areas not scheduled for growth soon, require additional infrastructure and would have a poorer commercial and job creation potential.”

52. In terms of the substantial centre shown to the east on the structure plan, Private Plan Change 48 proposes to rezone 35 hectares of Future Urban zoned land to Business: Metropolitan Centre zone. PPC48 was notified on 27 August 2020 and the Council hearing started on 28 July 2020. Private Plan Changes 49 and 50 were also notified on 27 August 2020, and seek to rezone 182 hectares of Future Urban zoned land to residential zones (under PPC49) and 48.9 hectares of Future Urban zoned land to THAB (under PPC50). The new Drury Central train station will be located within the PPC48 area. Should PPC48 be approved (as per the section 42A report recommendation), the centre will likely be provided earlier than its 2028 timing in the FULSS. It is envisaged to contain employment, social and community activities, and will create demand for residents of Drury West to travel east to it.

2.4. Notices of Requirement for Supporting Transport and Education Infrastructure

53. Auckland Transport and Waka Kotahi NZ Transport Agency, as requiring authorities under the RMA, issued Notices of Requirements (NoRs) in January 2021 for a number of new designations for future strategic transport corridors in the Drury area. These designations are to support the planned urban growth in the Drury-Opāheke area.

54. Of key relevance to PPC51 is Waka Kotahi’s NoR referred to as Project D1, to alter Designation 6707 to provide for widening the existing State Highway 22 from State Highway 1 (SH1) to Oira Creek to a four lane arterial with active transport facilities. The route is shown in green in **Figure 5** below. The Jesmond Road and Bremner Road FTN upgrades (in blue, referred to as D2 and D3) are also relevant. They confirm the frequent transit network (FTN) for Drury West, which does not directly adjoin the PPC51 land. I understand that connector/local bus services are proposed to run along some of the portion of SH22 adjoining the plan change area, as indicated in Council’s Drury-Opāheke Structure Plan, although these services do not have committed funding – and likely require SH22 to be improved first to provide safe pedestrian access to bus stops.

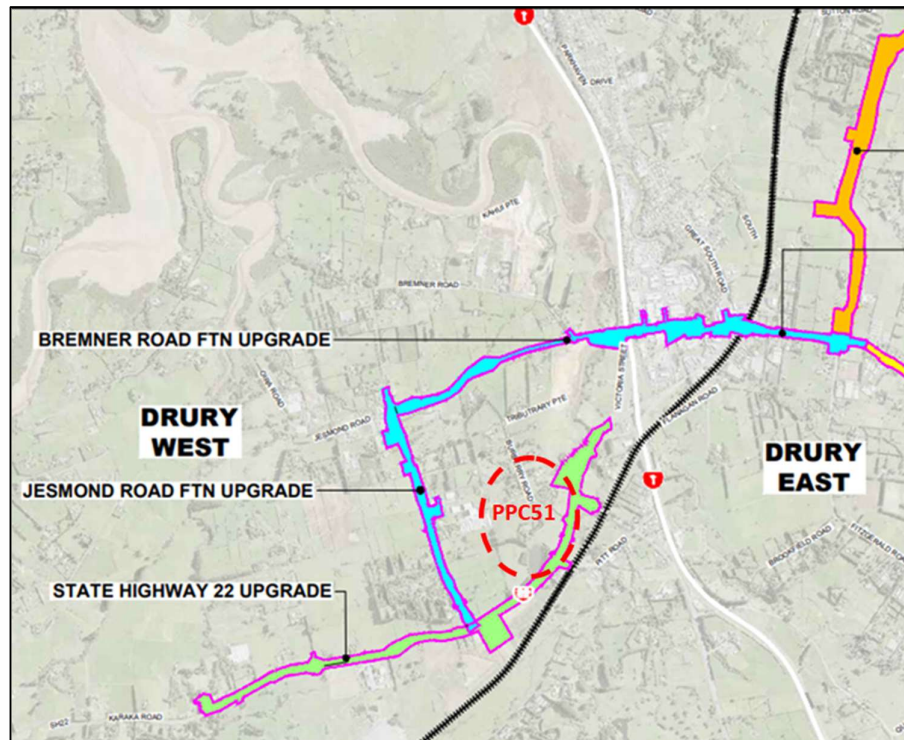


Figure 5: Drury Arterials NoR map

55. As described in the NoR documents, the purpose of the NoRs is to reserve land for future implementation of the required strategic transport corridors needed to support urban development in the area. The NoRs note that although developer plans aim to accelerate growth in Drury, funding of the Drury Arterial Network is currently uncertain and construction staging and timing has yet to be confirmed. As such the proposed transport corridors need to be protected so that they can be implemented in the future when required. The D1 – D3 upgrades are estimated to take 1 to 3 years to construct. The implementation timeframe for the upgrades has yet to be confirmed and will respond to timing of urban development as well as funding availability. However, it is currently anticipated that they will be implemented (as in construction has started) by approximately 2028. This would mean construction would be completed by around 2031.
56. On the general arrangement plans for the D1 NoR, a large stormwater wetland is proposed at the eastern edge of the PPC51 area (see **Figure 2** above for the overlap with the PPC51 area). Waka Kotahi will need to acquire this land, which PPC51 proposes as THAB zone, to construct the wetland.
57. The general arrangement plans do not indicate any new or upgraded intersections along SH22 to service the PPC51 land. A tie in with the existing Burberry Road is shown.
58. Submissions on the NoRs closed on 21 May 2021.
59. NoRs were also lodged by Waka Kotahi for Stage 1B1 of the Papakura to Drury South SH1 upgrade in June 2021. This stage relates to the Drury Interchange section of the upgrade route. As part of the upgrade, shared use pathways will be provided both under the Drury Interchange to connect to the eastern side of SH1 (Great South Road) and connecting up to a shared use path to be installed along the western side of the SH1 motorway. The applications are being sought under a fast-track process. Construction is expected to be completed by December 2023.
60. A NoR by the Minister of Education was also recently notified (March 2021) for a secondary school and Early Childhood Education Centre in Drury West. The secondary school site is on the eastern side of Jesmond Road within Drury 1 precinct, about 500m to the north-west of the PPC51 site.

2.5. Other Transport Infrastructure

61. KiwiRail is progressing plans for new Drury West, Drury Central and Paerata train stations. The Te Tupu Ngātahi / Supporting Growth Alliance (SGA) preferred location for the Drury West station is about 450m south-west of the SH22/Jesmond Road intersection (as of February 2021) – see **Figure 6** below. This is further south-west, and further away from the PPC51 area, than the location that was indicated on the Drury-Opāheke Structure Plan. The platforms are shown about a 1,340m walk from the centre of the proposed BTC zone in the PPC51 area (along SH22 and an extension of Jesmond Road).



Figure 6: Preferred Drury West Train Station location – Te Tupu Ngātahi, Feb 2021

62. The SGA previously consulted upon the location of the Drury West train station, with their May 2020 request for feedback explaining that Option A was the preferred location (the same location that is still preferred) and that Options B and C (closer to PPC51) were not preferred. PPC51 was lodged in the same month as this consultation document was issued, therefore the supporting documents for the plan change did not directly address this. Submissions and further submissions on PPC51 closed before the preferred location of the Drury West train station was confirmed in February 2021.
63. The train station is to be funded through the New Zealand Upgrade Programme (NZUP). The latest NZUP update in June 2021 continues to fund this work, and notes that further work is required before lodging consents / NoR for the Drury West station. The Drury Central and Paerata stations, also funded by NZUP, are further into the consenting process with construction expected to begin late 2022-early 2023 (applications for fast-track applications have been made to the Minister for the Environment). The Drury West station is estimated to be completed by 2025.
64. Figure 6 suggests that the NoR for the Drury West train station will include connecting the station to an extension of Jesmond Road, and that large areas adjoining the train station will be used for park and ride facilities. However, layout detail will not be known until those applications for consents / NoR are lodged.
65. I have carried out my analysis on the basis that the Drury West train station will be located as per Figure 6. While I acknowledge that the final form of the Drury West train station is not yet fixed (being subject to consent / NoR processes), I understand that there are

significant operational reasons for its proposed location and that it is reasonable and appropriate for the Commissioners to take the train station location as the most likely location. Reasons include:

- It sits within the largest catchment of developable land with the highest residential development potential, so is best placed to integrate with future development.
- It is well located to integrate with the rest of the transport network via the proposed SH22 north connection (Jesmond Road extension).
- It leaves enough distance to the next train station (Drury Central) and the future power feed location, such that trains can run efficiently.
- It has the least impact on the Ngākorua Stream tributaries.
- It is located on a straight piece of railway track, meaning that costly track realignments associated with other options can be avoided.²
- Additionally, from feedback received by SGA on the location of the stations published in February 2021 there was less support for the Paerata station location, but no similar concern stated for the Drury West station location.³

2.6. Transport Infrastructure Funding

66. As well as the three train stations mentioned above, NZUP also includes funding for electrifying the railway track between Papakura to Pukekohe with space for additional lines for future growth; and the SH1 improvements plus provision of a shared path from Papakura to Drury. The Auckland Transport Alignment Project 2021-2031 also identifies \$243 million funding for transport infrastructure in the Drury and Paerata growth area to support the NZUP investment. This has been included in the recent draft Regional Land Transport Plan 2021-2031, identifying almost \$250 million to support the accelerated development of the Drury growth area through public transport links, including to the new Drury rail stations.
67. In addition to the funded NZUP projects listed above, SGA has identified a range of public transport and arterial roading projects for the wider Drury area needed to support growth in the area, with work progressing on business cases and designations for these projects, but not all of the projects have secured funding. The SGA work has identified the importance of a ‘public transport first’ approach to transport investments. A transit-orientated form of growth is needed to address the limited capacity of the strategic road network.
68. For the Drury West area, the transport infrastructure upgrades considered to be relevant by both the requestor’s transport assessment and Council’s peer review are shown in Table 1, with comments on their status and funding.

Table 1: Transport Infrastructure Funding for Drury West

Upgrade	Status / Funding
Upgrade of the Jesmond Road / SH22 intersection to either roundabout or signals	Interim intersection improvements already undertaken. Further improvements are required, and expected to be developer funded.
Collector road connections from the plan change area with signalised intersection of realigned Burberry Road, SH22 and McPherson Road	SH22 NoR does not account for providing new/relocated intersections with the PPC51 area. As this is directly related to traffic generated by the plan change, they are expected to be developer funded.

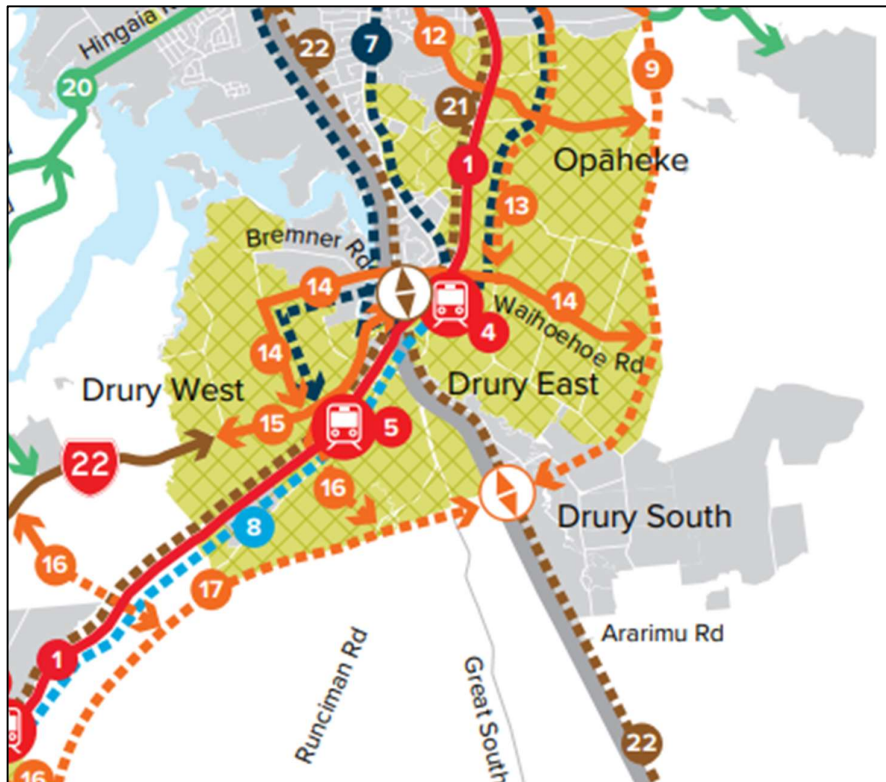
² SGA Project info sheet “New train stations for Drury and Paerata” dated February 2021

³ SGA Project Engagement Summary “New train stations for Drury and Paerata” dated 16 June 2021

SH22 upgrade to four lane urban road with associated signalised intersections and pedestrian / cycling facilities (likely completed in stages)	NoR lodged. Funding for implementation is currently uncertain, but expected to be provided so that it is implemented (construction started) by 2028.
SH1 Papakura to Drury South (six lanes plus shared path)	Funded by NZUP. Construction has started on Stage 1A (around Papakura Interchange). Fast track applications have been made for Stage 1B1 (around Drury Interchange) in June 2021 and construction is to be completed by December 2023. Preparation underway, but no applications yet made for Stage 1B2 (between Drury Interchange and Papakura/Stage 1A) or for Stage 2 (south to a new Drury South interchange). Project is expected to be completed in late 2025.
Electrification (Papakura to Pukekohe) and construction of rail station in Drury (Drury west)	Electrification and rail station are funded by NZUP. Enabling works for electrification are underway. Drury West station expected to be completed by 2025.
Pedestrian / cycling links to Drury West Rail station	For the PPC51 site, need to be provided through a combination of internal links, the NoR lodged for SH22 upgrade (or an interim solution providing active transport facilities along SH22) and the Jesmond Road extension to the Drury West rail station. Funding to implement the NoR is currently uncertain, but expected to be provided so that it is implemented by 2028. The draft 2021-2031 Auckland Regional Land Transport Plan proposes \$250 million to support links to the new Drury stations, with a priority on route protection, property purchase and infrastructure to support bus links. Some funding for active transport links on Jesmond Road extension to access the Drury West train station may be available through this. NoR for the station is not yet lodged, so unclear to what extent active transport links will be provided, however the indicative footprint does go up to Jesmond Road and shows cycle and walking symbols. No projects are currently known to be planned east of Drury Interchange that would provide a continuous safe active transport route from the PPC51 area to the Drury Central train station.
Bus network upgrade linking precinct to the Drury train stations	NoRs lodged for the Bremner Road and Jesmond Road FTN routes. Funding for implementation is currently uncertain, but expected to be provided so that it is implemented (construction started) by 2028. Connector bus route along SH22 to south of PPC51 area shown on the structure plan is not yet funded, and likely requires pedestrian improvements to SH22.

69. In summary, there is currently expected to be funding available for all of the identified upgrades by 2028 and completion of the upgrades by 2031.

70. In the longer term, the SGA's indicative strategic transport network (July 2019) identifies the Pukekohe Expressway from Drury South interchange to Pukekohe along the southern edge of the Drury West future urban area, and an arterial link road from the expressway joining up to Jesmond Road (see **Figure 7**). Further technical investigations and engagement is required, with these projects yet to be prioritised for funding for delivery.



- 5 New train station – Drury West
- 14 Upgrade Jesmond Road, Bremner Road and Waihoehoe Road
- 15 Upgrade Drury West section of SH22
- 16 Connections from SH22 to the Pukekohe Expressway
- 17 New Pukekohe Expressway connecting Pukekohe to SH1

Figure 7: SGA Indicative Strategic Transport Network 2019

2.7. National Policy Statement on Urban Development 2020

71. The National Policy Statement on Urban Development (NPS-UD) came into force on 20 August 2020, after PPC51 was accepted by the Council under clause 25(2)(b) of Schedule 1 of the RMA, and post the Auckland Plan being adopted (June 2018) and the updated FULSS (2017). At a strategic level, the NPS-UD reinforces the need for RMA plans to provide sufficient capacity to accommodate the next 10 years’ growth, taking into account what is feasible and likely to occur. Infrastructure must be co-ordinated with this capacity, with ‘infrastructure-ready’ land being land where there is funding in place to provide for the anticipated growth.

72. A recent Environment Court decision⁴ held that Objectives 2, 5, 7 and Policies 1 and 6 are relevant to the merits of a private plan change request, and other objectives and policies that do not refer to ‘planning decisions’ do not have to be given effect to at this point in time. These “other objectives and policies” include Objective 3 and Policy 3 in relation to building heights and density requirements for certain locations. While not needing to give

⁴ *Eden-Epsom Residential Protection Society Incorporated v Auckland Council* [2021] NZEnvC 082.

effect to these, I consider the Commissioners can have regard to the direction of Objective 3 and Policy 3 for PPC51, as a private plan change on Future Urban zoned land.

73. The PPC51 area now falls outside of the walkable catchment of a planned Rapid Transit Network station,⁵ and is currently not within an 800m walk of the edge of the proposed Metropolitan Centre zone at Drury East (future pedestrian upgrades that cross the SH1 motorway and railway may bring a small part of the area within 800m). Therefore the applicable intensification direction of the NPS-UD would be Policy 3(d):

in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:

- (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
- (ii) relative demand for housing and business use in that location.*

74. While Council's planning committee has endorsed an approach of "around 800m" from Rapid Transit Network stops and Metropolitan Centre zone as a walkable catchment, I recognise that some people would be happy to walk further than this, while an increased distance would preclude or discourage others.

3. EXISTING PLAN PROVISIONS

75. An AUP map of the PPC51 area showing zoning and key overlays and controls is included in **Figure 8** below. The land subject to the plan change is zoned Future Urban Zone (FUZ) under the AUP. The FUZ is a transitional zone applied to greenfield land that has been identified as suitable for urbanisation. In the interim, land in the FUZ may be used for a range of general rural activities, with urban activities either enabled by a plan change that rezones the land for urban purposes, or which are authorised by resource consent.

76. The surrounding area is zoned FUZ to the south and the west and MHU zone to the north (this land is also within Drury 1 precinct). To the east is SH22/Karaka Road, on the other side of which is an Open Space – Conservation zone over Ngākoroa Reserve, and some more FUZ land.

77. The plan change land is also subject to the following AUP overlays and controls:

- High-Use Stream Management Area overlay
- Coastal Inundation 1 per cent AEP plus 1m control
- Macroinvertebrate Community Index – Rural

78. A terrestrial ecology SEA applies to the Ngākoroa Stream adjacent to the plan change area (SEA_T_530b). The Ngākoroa Stream discharges into Drury Creek, which in turn discharges into the Pahurehure Inlet, within the eastern Manukau harbour. The upper reaches of the Drury Creek, into which the Ngākoroa Stream discharges, is classified as a Significant Ecological Area (SEA) – Marine 1, under the AUP (SEA-M1-29b) due to the presence of marshland. The classification also recognises the area as a migration path between the marine and freshwater habitats for a number of native freshwater fish.

79. A statutory acknowledgement (Ngāti Tamaoho) applies to the majority of the PPC51 area, excepting the northern portion of the site. This was established under the Ngāti Tamaoho Claims Settlement Act 2018. Specifically, this statutory acknowledgement relates to

⁵ Defined as around 800m from Rapid Transit Network stops – endorsed by Auckland Council Planning Committee meeting minutes 1 July 2021

Ngākoroa Stream and its tributaries, and formally acknowledges the particular cultural, spiritual, historical, and traditional association Ngāti Tamaoho has with this land. Appendix 21 of the AUP notes that the banks toward the lower portion of Ngākoroa were occupied by several kainga and mahinga kai sites.

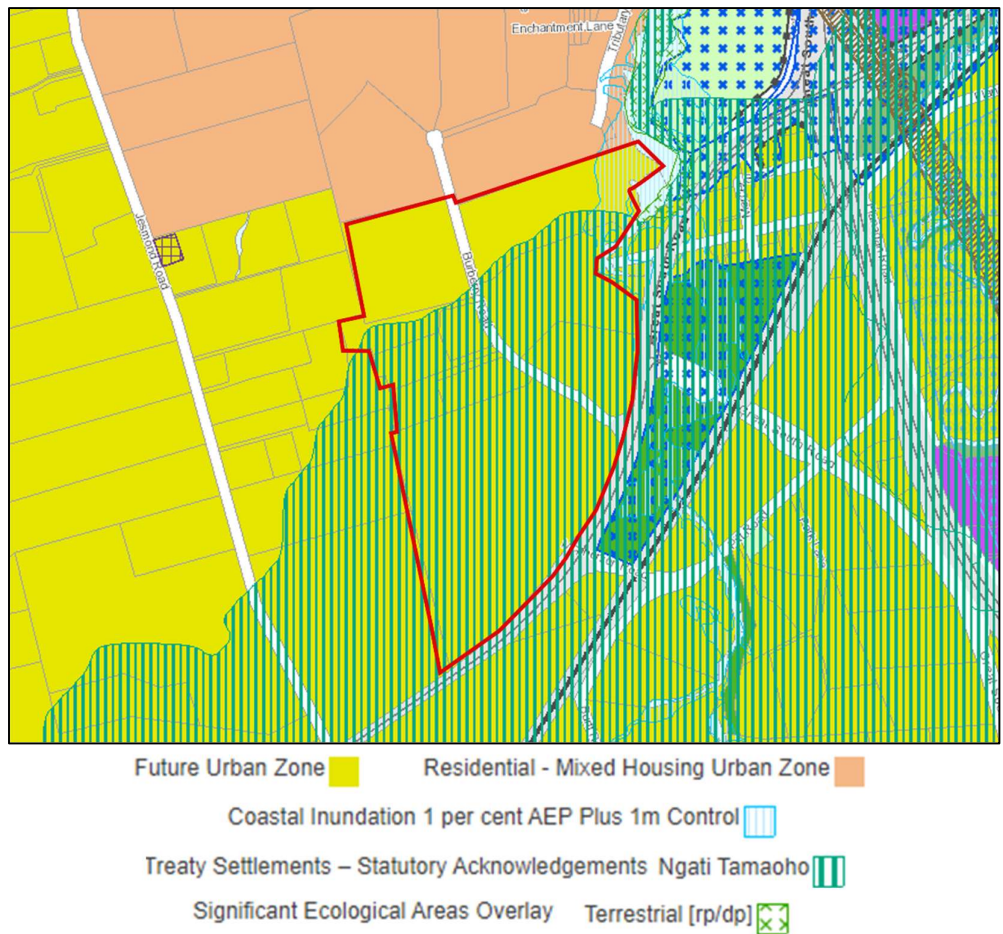


Figure 8: Operative AUP zonings

4. PROPOSED PLAN CHANGE PROVISIONS

80. The approach of PPC51 is to rely largely on standard zones and Auckland-wide provisions to manage the way in which the plan change area is used and developed. The plan change seeks to introduce a precinct (Drury 2 Precinct) 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” as per A1.6.5 of the AUP.

4.1. Proposed Zones and Overlays

81. The proposed zoning layout is shown on **Figure 9** below. PPC51 seeks to rezone 33.65 hectares of Future Urban zoned land for urban development, which will comprise:

- 15.29 ha BTC zone;
- 13.75 ha THAB zone; and
- 4.61 ha MHU zone.

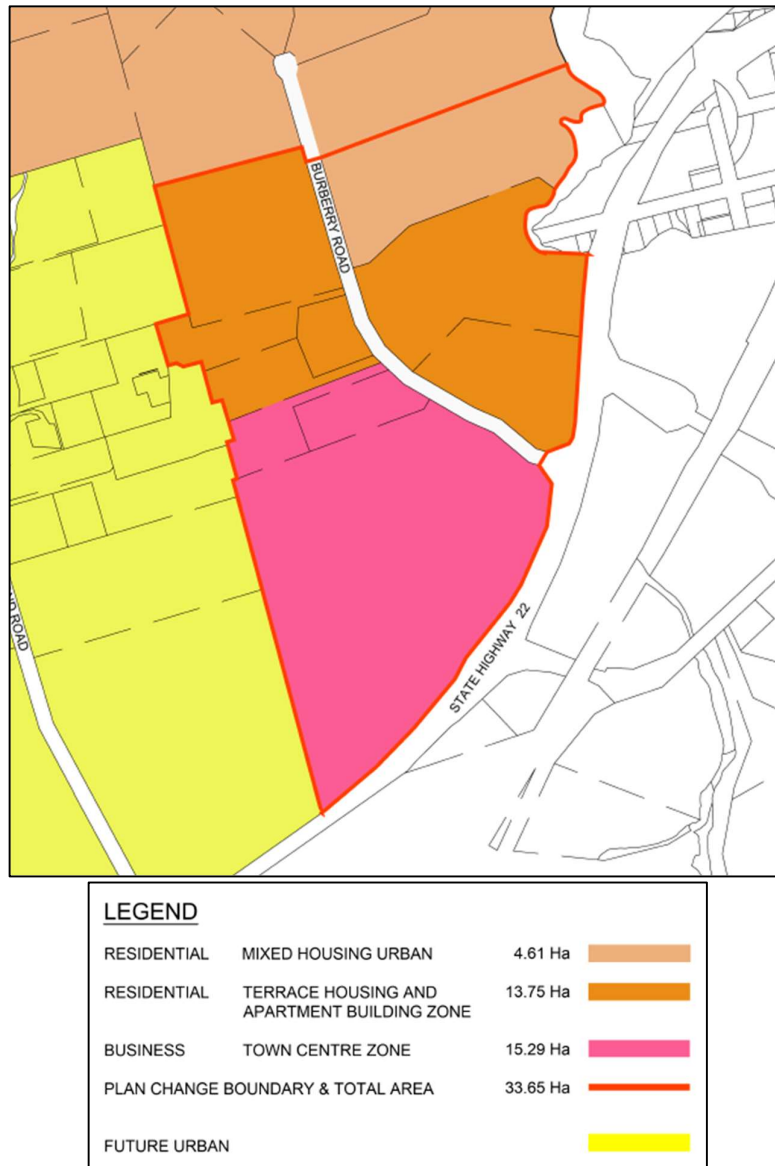


Figure 9: Proposed Zoning Plan

82. The BTC zone is applied to suburban centres, satellite centres and rural towns across Auckland, typically located on main arterial roads. The zone provides for a wide range of activities including commercial, leisure, residential, tourist, cultural, community and civic services, providing a focus for commercial activities and growth. The BTC zone is proposed to apply to the southern portion of the PPC51 area.

83. A Height Variation Control within the BTC zone of 27m is also proposed.

84. The THAB zone is the highest intensity residential zone providing for urban residential living in the form of terrace housing and apartments, predominantly located around centres and the public transport network. Buildings are enabled up to 5-7 storeys. The THAB zone is proposed to be applied to the north and east of the BTC zone.

85. The MHU zone is a reasonably high-intensity zone enabling development up to three storeys in a variety of sizes and forms, including detached dwellings, terrace housing and

low-rise apartments. The MHU zone is proposed in the north-eastern corner of the precinct, to the north of the proposed THAB zoning on the eastern side of Burberry Road.

86. In addition, it is proposed to apply the Stormwater Management Area Control – Flow 1 (SMAF1) overlay to the entire plan change area. All other existing controls and overlays identified in section 2 above will continue to apply to the plan change area.

4.2. Precinct Provisions

87. A new 'Drury 2 Precinct' is proposed to be applied to the plan change area, with corresponding plan provisions added to Chapter I of the AUP, as set out in Attachment 3 to the plan change documentation. A precinct plan is proposed showing spatial features including future roads, intersections, building frontage controls, esplanade reserve and water feature (see **Figure 10** below).
88. The precinct is described as providing for a town centre within Drury West to support the growing resident and worker population. The precinct anticipates the realignment of Burberry Road providing for an interconnected roading network from the Drury 1 precinct to the north, through the new town centre to SH22.
89. Five precinct-specific objectives and six precinct-specific policies are proposed. Objectives include that the town centre achieves high-quality urban design outcomes, services the needs of the Drury West area, and is supported by high-density residential development. Land use and transport are to be integrated, and infrastructure necessary to service development within the precinct is to be established in a coordinated and timely way.
90. Key differences introduced by the precinct rules in comparison to the standard Auckland-wide and zone rules include:
- Any activities and subdivision that do not comply with a precinct-specific transport infrastructure requirements standard are non-complying activities. This standard requires the intersection of SH22 and Jesmond Road to be upgraded with a double lane roundabout or traffic signals, or interim approved traffic safety solution.
 - Any activities and subdivision that do not comply with three other precinct standards are discretionary activities. These standards require compliance with the elements shown on the Precinct Plan, riparian margin planting of 10m width for streams, and no vehicle access occurring across a road with a 3m shared footpath or protected cycle lane.
 - The underlying AUP rules apply to all other activities, with an additional matter of discretion and assessment criterion applying to restricted discretionary activities related to their consistency with the objectives and policies of the Drury 2 precinct.

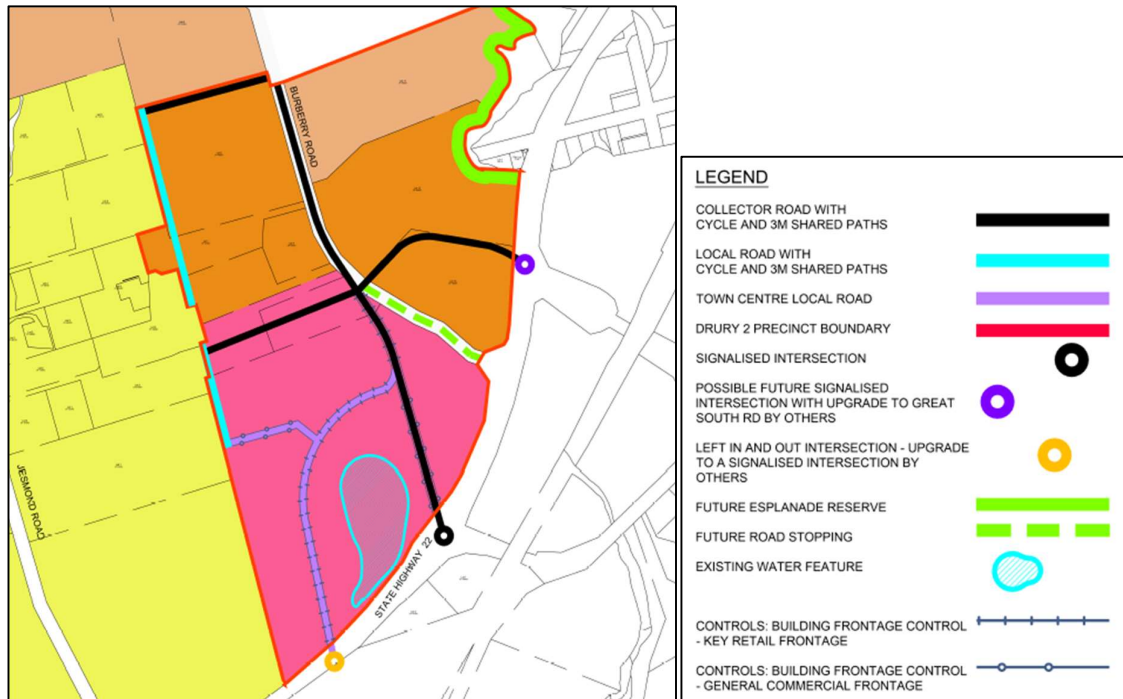


Figure 10: Proposed precinct plan – Drury 2 precinct

5. CONSULTATION

91. No specific consultation was undertaken with landowners or other interest groups on this plan change. The requestor has relied upon the consultation undertaken by Council as part of developing the Drury-Opāheke Structure Plan between 2017 and 2019 and previous consultation undertaken during their own structure planning work prior to this.

5.1. Mana Whenua

92. The Mana Whenua groups identified on Auckland Council's mapping whose rohe covers the PPC51 area include:
- Ngāti Tamaoho (also with Statutory Acknowledgement across the southern part of the area – Ngākoroa Stream and its tributaries)
 - Ngāti Te Ata
 - Te Ākitai Waiohū
 - Ngāi Tai ki Tāmaki
 - Waikato – Tainui
 - Ngāti Maru
 - Te Ahiwaru - Waiohū
93. As per the requestor's clause 23 response, Ngāti Tamaoho, Ngāti Te Ata and Te Ākitai Waiohū have undertaken a site visit to the plan change area with KDL representatives in March 2019 and attended subsequent hui with KDL to discuss the plan change content. However no written feedback or Cultural Impact Assessments (CIA) were provided for this plan change application. The three iwi have previously provided CIAs for the neighbouring Drury 1 precinct (plan variation 15 and plan change 6).

94. Iwi consultation was undertaken by Council for the Drury-Opāheke Structure Plan across the wider area. During this process an iwi submission (made in May 2019) expressed high level support for a town centre located in Drury West.
95. Rather than undertaking further separate consultation on this plan change or commissioning any CIA, the requestor has sought to rely on information from the consultation already undertaken by Council and themselves and reviewing Iwi Management Plans. The requestor states that there is no mandatory consultation requirement for private plan change requests, given that these must be prepared and notified under Part 2 of Schedule 1 to the RMA and are only subject to the provisions in Part 1 requiring iwi consultation once the plan change is accepted by council.
96. Ngāti Te Ata Waiohū and Ngāti Tamaoho submitted on PPC51, and both oppose the plan change on the basis that there has been no meaningful engagement with Mana Whenua, and they have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected.

5.2. Local Boards

97. Franklin Local Board's views on PPC51 were set out in a memo dated 29 April 2021. The Local Board:
 - note that the majority of public submissions (32) support this plan change or support with amendments
 - acknowledge public concerns around the funding and timing of infrastructure upgrades required to support urbanisation of these sites, particularly transport and note that these concerns reflect concerns consistently raised by communities within the Franklin Local Board area regarding green-field development
 - note that fit for purpose roading design, integrated public transport options and active transport options will be critical to successful development and community well-being
 - acknowledge that Ngāti Te Ata Waiohū and Ngāti Tamaoho submitted on PPC51 and both oppose the plan change on the basis that there has been no meaningful engagement with Mana Whenua, and suggest that the applicant work with mana whenua to develop bespoke cultural assessments as a condition of this plan change.
98. Papakura Local Board's views on PPC51 were set out in meeting minutes dated 5 May 2021. In summary, the Local Board:
 - considers that the plan change must align with the already consulted on Drury-Opāheke Structure Plan
 - considers green space provision is imperative for both passive and active recreation and needs to take into account the wider parks and reserve network. The plan change appears to have very limited green space. Suitable types of open space need to be ensured (e.g. informal recreation). Connected path/cycle ways linking to reserves and key infrastructure need to be planned for
 - would like to see significant planting of trees to increase canopy coverage in the area
 - is concerned about lack of off-street parking and considers two onsite car parks for every unit should be required and on street visitor parking should also be made available. Roads should be wide enough for emergency service vehicles and rubbish trucks
 - notes that public transport does not work for everyone and there is a need to cater for cars as well

- encourages consultation with Mana Whenua and implementing recommendations into the design of the development
- recommends appropriate stormwater treatment to ensure the optimum outcome to the receiving environment, and rain harvesting/stormwater recycling.

6. HEARINGS AND DECISION MAKING CONSIDERATIONS

99. Clause 8B (read together with Clause 29) of Schedule 1 of the RMA requires that a local authority shall hold hearings into submissions on a proposed private plan change.
100. The Regulatory Committee has delegated to the Hearings Commissioners authority to determine Council's decisions on submissions on PPC51, under section 34 of the RMA. Hearing Commissioners will not be recommending a decision to the council, but will be issuing the decision directly.
101. This report summarises and discusses the likely effects of PPC51 and discusses submissions received on the plan change. This report identifies what amendments, if any, are recommended to be made to address matters raised in submissions. It makes recommendations on whether to accept, in full or in part; or reject, in full or in part; each submission. Any conclusions or recommendations in this report are not binding on the Hearing Commissioners.
102. The Hearing Commissioners will consider all the information in submissions together with evidence presented at the hearing.
103. This report relies on the reviews and advice from the following experts on behalf of the council and specialist Auckland Council officers. These assessments are attached in **Appendix 4** to this report in the order below.

Matter	Reviewing specialist
Transportation	Mat Collins, Flow Transportation Specialists
Urban Design, Landscape and Visual	Rebecca Skidmore, R.A. Skidmore Urban Design Ltd
Economics	Tim Heath, Property Economics
Stormwater	Trent Sunich, 4sight Consulting
Terrestrial Ecology	Carl Tutt, Auckland Council
Freshwater Ecology	Connor Whiteley, Beca
Parks	Robin Rawson, Xyst Ltd
Heritage/archaeology	Robert Brassey, Principal Specialist Cultural Heritage, Auckland Council
Geotechnical	James Beaumont, Riley Consultants Ltd
Contamination	Andrew Kalbarczyk, Senior Specialist – Contaminated Land, Auckland Council

104. Facilitated transport and planning expert conferencing sessions were held on 2 July 2021 and a further session is to be held on 10 August 2021. Transport and planning Joint Witness Statements for 2 July are attached at **Appendix 5**. I refer to the outcomes of the first conferencing session where relevant. The outcomes of the 10 August session

have not been incorporated in this report, due to this report being finalised prior to that date.

7. STATUTORY AND POLICY FRAMEWORK

105. Private plan change requests can be made to the Council under Clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as Council initiated plan changes, and the private plan change request must contain an evaluation report in accordance with section 32 of the RMA (clause 22(1), Schedule 1, RMA). Clause 29(1) of Schedule 1 provides “*except as provided in subclauses (1A) to (9), Part 1, with all necessary modifications, shall apply to any plan or change requested under this Part and accepted under clause 25(2)(b)*”.
106. The RMA requires territorial authorities to consider a number of statutory and policy matters when developing proposed plan changes.
107. The key directions of the RMA with regard to consideration of private plan changes are set out in Table 2 below.

Table 2: Sections of the RMA relevant to private plan change decision making

RMA Section	Matters
Part 2	Purpose and principles of the RMA
Section 31	Sets out the functions that territorial authorities shall have for the purpose of giving effect to the RMA in the territorial authority district
Section 32	Sets out the requirements for preparing and publishing evaluation reports
Section 72	Sets out that the purpose of the preparation, implementation and administration of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of the RMA
Section 73	Provides that there must at all times be a district plan for the district prepared in the manner set out in the relevant Part of Schedule 1. Sets out the manner in which the district plan can be changed, and when it must be changed.
Section 74	Sets out the matters that must be considered by a territorial authority when preparing and changing its district plan. This includes its functions under section 31, the provisions of Part 2 of the RMA, a direction given under s25A(2), its obligation (if any) to prepare an evaluation report in accordance with s32, its obligation to have particular regard to an evaluation report prepared in accordance with s32, a national policy statement, a New Zealand coastal policy statement, a national planning standard, and any regulations. It also sets out the documents that a territorial authority shall have regard to (which are in addition to the requirements of s75(3) and (4)).
Section 75	Outlines the mandatory and optional requirements for the contents of a district plan, specifies which documents a district plan must give effect to, and specifies which documents a district plan must not be inconsistent with.
Section 76	Provides that a territorial authority may include rules in a district plan for the purpose of – (a) carrying out its functions under the RMA; and (b) achieving the objectives and policies set out in the district plan.
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities and private plan change applications

108. The mandatory requirements for plan preparation are comprehensively summarised by the Environment Court in *Long Bay-Okura Great Park Society Incorporated and Others v North Shore City Council* (Decision A078/2008). Subsequent cases have updated the *Long Bay* summary, including *Colonial Vineyard v Marlborough District Council* [2014] NZEnvC 55, reflecting amendments to the RMA since the Long Bay decision. This is outlined in Box 1.

Box 1**A. General requirements**

1. A district plan (change) should be designed to accord with, and assist the territorial authority to carry out its functions so as to achieve, the purpose of the Act.
2. When preparing its district plan (change) the territorial authority must give effect to any national policy statement or New Zealand Coastal Policy Statement.
3. When preparing its district plan (change) the territorial authority shall:
 - (a) have regard to any proposed regional policy statement;
 - (b) give effect to any operative regional policy statement.
4. In relation to regional plans:
 - (a) the district plan (change) must not be inconsistent with an operative regional plan for any matter specified in section 30(1) [or a water conservation order]; and
 - (b) must have regard to any proposed regional plan on any matter of regional significance etc.;
5. When preparing its district plan (change) the territorial authority must also:
 - have regard to any relevant management plans and strategies under other Acts, and to any relevant entry in the Historic Places Register and to various fisheries regulations; and to consistency with plans and proposed plans of adjacent territorial authorities;
 - take into account any relevant planning document recognised by an iwi authority; and
 - not have regard to trade competition;
6. The district plan (change) must be prepared in accordance with any regulation (there are none at present);
7. The formal requirement that a district plan (change) must also state its objectives, policies and the rules (if any) and may state other matters.

B. Objectives [the section 32 test for objectives]

8. Each proposed objective in a district plan (change) is to be evaluated by the extent to which it is the most appropriate way to achieve the purpose of the Act.

C. Policies and methods (including rules) [the section 32 test for policies and rules]

9. The policies are to implement the objectives, and the rules (if any) are to implement the policies;
10. Each proposed policy or method (including each rule) is to be examined, having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives of the district plan taking into account:
 - a) the benefits and costs of the proposed policies and methods (including rules); and
 - b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.

D. Rules

11. In making a rule the territorial authority must have regard to the actual or potential effect of activities on the environment.

E. Other statutes:

12. Finally territorial authorities may be required to comply with other statutes. Within the Auckland Region they are subject to:
 - the Hauraki Gulf Maritime Park Act 2000;
 - the Local Government (Auckland) Amendment Act 2004.

109. **Appendix 6** provides a full list of relevant RMA matters that need to be taken into account in decision making. I specifically refer to these where relevant within my analysis in sections 8 and 10 below, with an overall assessment against the statutory framework provided in section 11.

8. ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

110. Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by the plan change, taking into account Schedule 4 of the RMA.

111. An assessment of actual and potential effects on the environment (AEE) is included in the private plan change request and supporting documents. The submitted plan change request identifies and evaluates the following actual and potential effects:

- General land use change effects
- Transport effects
- Effects on other infrastructure
- Urban design effects
- Economic effects
- Ecological effects
- Stormwater effects
- Social effects including open space
- Landscape and visual effects
- Hazards and land contamination effects
- Heritage and archaeological effects
- Reverse sensitivity effects
- Positive effects.

112. A review of the AEE and supporting documents, taking into account further information provided pursuant to Clause 23 to Schedule 1 of the RMA, is provided below. In addition to the topics addressed in the AEE, I consider it also necessary to review spatial planning effects associated with urban form.

8.1. Spatial Planning Effects

113. As set out in section 2 above, this plan change request takes place within a wider strategic context of planning for substantial urban expansion areas in southern Auckland. The Auckland Plan (and AUP Rural Urban Boundary) defines the spatial extent of the expansion areas, while the FULSS sets out the timing of the land release (which PPC51 is consistent with). Future Urban zoned land is to be live zoned following structure planning in accordance with the guidelines in Appendix 1 to the AUP.

114. The Drury-Opāheke Structure Plan took a comprehensive approach to establishing the land use and zoning pattern for the wider Drury-Opāheke area. It illustrates an indicative land use/zoning pattern. However, the Drury West train station is now likely to be in a different location to what is shown, so the zoning pattern needs to be re-examined as to whether it continues to meet the key outcomes specified by the structure plan and give effect to the AUP RPS.

115. On the advice of Mr Heath (further discussed in section 8.5 below) and as set out in the Drury-Opāheke Structure Plan, only one larger town centre of 7-8ha (net commercial

extent) is required to serve Drury West (with a couple of small centres as well). PPC51 proposes to be the location of that primary town centre for Drury West.

116. The key part of the AUP which sets out the guiding principles for how growth should occur, which future urban area plan changes must give effect to, is Chapter B2 – Urban growth and form. The zone chapters also guide the suitable application of the respective zones. A town centre, as per Chapter H10 of the AUP, is a focus for employment-related activities, retail, community and entertainment activities and is typically located on arterial roads, which provide good public transport access.

117. I consider that the locations of the Drury West train station and FTN is a critical factor in determining whether the proposed town centre gives effect to AUP RPS objectives in Chapter B2 on urban growth and form, a quality built environment, and commercial growth. I see the following sub-clauses as particularly relevant:

Objective B2.2.1(1) A quality compact urban form that enables all of the following:
(c) better use of existing infrastructure and efficient provision of new infrastructure;
(d) improved and more effective public transport;

Policy B2.2.2(7) Enable rezoning of land ... zoned future urban to accommodate urban growth in ways that do all of the following:
(a) support a quality compact urban form; ...
(c) integrate with the provision of infrastructure;

Objective B2.3.1(1) A quality built environment where subdivision, use and development do all of the following:
(d) maximise resource and infrastructure efficiency; ...
(f) respond and adapt to the effects of climate change.

Policy B2.3.2(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:
(a) providing access for people of all ages and abilities;
(b) enabling walking, cycling and public transport and minimising vehicle movements;

Policy B2.5.2(4) Enable new metropolitan, town and local centres following a structure planning process and plan change process in accordance with Appendix 1 Structure plan guidelines, having regard to all of the following: ...
(e) any significant adverse effects on existing and planned infrastructure;
(f) a safe and efficient transport system which is integrated with the centre;

118. I also consider that there is a strong transit-oriented development directive in AUP Chapter B2, with the general approach being to promote the intensification of residential, business and community activities within a hierarchy of centres and corridors, where public transport accessibility is high. This is consistent with other key spatial planning documents, including the Auckland Plan and SGA's work on future transport networks to support new urban areas, as well as the built environment outcomes sought by Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

119. As noted below in the transport effects assessment (section 8.2), the proposed town centre is not particularly well located from a public transport accessibility and connectivity perspective. The new proposed location of the Drury West train station is about 1,300m walk from the centre of the BTC zone, and the bus FTN (not to be provided until about 2030) is approximately 700m walk, which may reduce to around 500m upon the development of adjoining land. Further, accessing the station requires travel along

SH22, which currently does not have safe pedestrian facilities, nor an operational/funded Connector bus route – both of which are not expected to be provided until 2031. Alternatively, the Drury Central train station is also about 1,500m walk from the BTC zone along SH22 and Great South Road, without any projects known to be planned to provide continuous safe pedestrian access along this route east of the Drury Interchange. Generally, I assess that the BTC zone location proposed by PPC51 does not give effect to the above listed RPS objectives and policies due to its limited integration with public transport infrastructure and resultant likely high level of car-dependency. It does not minimise vehicle movements, respond to the effects of climate change nor maximise the efficiency of the investment being made into the train station.

120. When planning for the significant greenfields future urban area of Drury West, I consider that there is the opportunity for optimal land use and transport integration outcomes to be pursued. To maximise resource and infrastructure efficiency (capitalising on the investment in the train station), minimise potential vehicle movements and ensure the town centre is integrated with a safe, efficient transport system that can serve a wide range of people (e.g. young, older, less able), I consider that the Drury West town centre is best located within a walkable catchment of the proposed train station (which would also make it adjacent to the FTN). This would maximise accessibility for a greater number of consumers and employees in the wider Drury West area.
121. There is also support for this approach in the NPS-UD. Objective 1 and Policy 1 place importance upon well-functioning urban environments that
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.
122. NPS-UD Objective 6 directs urban development to be integrated with infrastructure planning and funding decisions, and be strategic over the medium and long terms. I consider that locating the town centre within a reasonable walking distance of the Drury West train station rather than in the location provided in PPC51 is consistent with this direction, as this takes a strategic, long-term view to the efficient and sustainable development of the whole of the Drury West future urban area.
123. Objective 3 and Policy 3 of the NPS-UD also direct intensification of residential, business and community services in locations near centres zones, employment opportunities, and public transport services.
124. The key relevant objectives of the centres and BTC zone in AUP Chapter H10.2 are:
(1) 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.
(6) Town centres are the focus of commercial, community and civic activities for the surrounding area and which provide for residential intensification.
(8) Town centres are an attractive place to live, work and visit with vibrant and vital commercial, entertainment and retail areas.
125. The following policy also applies to the BTC zone:
H10.2(15) Provide for town centres including new town centres of different scales and locations, that:

- (a) service the surrounding community's needs for a range of uses, such as commercial, leisure, tourist, cultural, community and civic activities; and*
- (b) support a range of transport modes including, public transport, pedestrian and cycle networks and the ability to change transport modes.*

126. The PPC51 land includes the existing lake feature, which would increase the attractiveness of the centre. The BTC zone provisions enable a wide range of commercial, residential, community, and civic activities with urban design controls, therefore the application of this zone would achieve the BTC objectives to some extent through the take-up of these opportunities. However, under section 32 of the RMA, the zoning applied to land should be the most appropriate method for achieving the district plan objectives. In my view (which is supported by comments made in Mr Heath's economics peer review), the attractiveness of PPC51's location to community and civic activities and certain employment activities is diminished due to limited public transport integration. Therefore I do not consider the proposed BTC zone is the most appropriate zoning for the PPC51 land.
127. I also consider that the town centre proposed by PPC51 is not entirely aligned with the Drury-Opāheke Structure Plan connectivity and western town centre outcomes (sections 3.1.2 and 3.13.2), which reflect the same transit-oriented approach to the location of centres and intensification as the AUP RPS. For example:
- 3.1.2 (3a). The transport network responds to anticipated economic growth by providing efficient, resilient and safe connections to employment areas, centres and other destinations within Drury – Opāheke and the wider Auckland region.
 - 3.1.2 (3b). Frequent, reliable and attractive public transport options provided by enhancing network connections to support the growth of centres and high-density residential development along key transport routes.
 - 3.13.2 The centre should be located, sized, designed, zoned and serviced to provide for high densities aiming to achieve at least 110 persons per hectare within a walkable distance of the railway station; provide high job numbers, particularly close to the station and FTN, but elsewhere as well; emphasise pedestrian and cycle connectivity to the station.
128. In the structure plan the Drury West centre location has a clear relationship to the train station location shown on the structure plan map. The station location has now been proposed to change. Consequently the level of connectivity anticipated between the two would no longer be delivered by the town centre proposed by PPC51.
129. The structure plan does explicitly state that the western centre should be between Jesmond Road and Burberry Road, and that the benefits of such a location include proximity to proposed industrial business areas, visibility to traffic on SH22, and the earlier delivery of the centre. The strategic situation has changed since the structure plan was prepared, with the proposed Drury West train station now funded through the NZUP funding and to be provided much earlier than anticipated. As a result, an alternative Drury West town centre location can now be better connected to the rapid transport network at an earlier time. In addition, a substantial Drury East Centre (metropolitan centre) is potentially also proceeding earlier than scheduled. The proposed industrial business land to the southeast is not scheduled for release until after 2028, and is close to the Drury East metropolitan centre which is also likely to serve this catchment. Very little of the proposed industrial land is within a walkable catchment of the BTC zoning proposed by PPC51, while the level of vehicle accessibility to and from the industrial business area would not be significantly changed for an alternative town centre location closer to the Drury West train station.

130. I do not see an urgent need to provide a Business: Town Centre zone in Drury West. The economic analysis submitted with the plan change request anticipates that in the next 7-10 years the Drury West market will only require a supermarket and specialty retail, with offices only anticipated later. This is more the equivalent of a local centre under the AUP in the short term. The SH22 upgrade and Jesmond Road FTN are not anticipated to commence construction until 2028, and (unless an interim solution can be provided) there will be no safe pedestrian routes to public transport routes from the PPC51 area until these are in place. I have recommended that the upgrade of SH22 between Jesmond Road and State Highway 1 is a precursor to occupation of development in section 8.2 below, which would mean a local centre would potentially not be able to operate prior to 2030 anyway.
131. In respect of the structure plan I conclude that critical factors identified in support of the western centre location as shown on the structure plan land use map have changed, and that the remaining factors are not persuasive enough to continue to favour the location of the centre and in particular a town centre as far to the east as it is shown.
132. I acknowledge the requestor has done considerable work to develop their proposal and demonstrate consistency with the relevant provisions and statutory tests. However, this assessment was carried out prior to the recent train station location being announced (which, as outlined above, is different to the train station location on the structure plan), and in my opinion much of the key analysis on zone suitability hinges upon the site having good public transport access.
133. No specific technical assessments have been done in support of an alternative town centre location further to the west adjacent to the future proposed Drury West train station. Such a zoning proposal would require a separate Schedule 1 RMA process and cannot be guaranteed through this plan change process. However, I do note that the land around the Drury West train station location has been confirmed as suitable for urbanisation through the Drury-Opāheke Structure Plan process, and no major constraints such as large scale flooding and stream networks have been mapped here. Further, since the wider 'town centre' function is not anticipated to eventuate within the short term, there is time for alternative proposals to be progressed through either a public or a private plan change. In section 11 I have set out my view that the risk of an alternative town centre not being provided at all is low.
134. The quality compact urban form sought by the RPS requires that where new greenfields areas have been opened up for urbanisation, this scarce resource must be developed in a sustainable, efficient and resilient manner that is integrated with the provision of infrastructure.
135. In my view, placing the primary town centre for Drury West within the PPC51 area would come at a significant opportunity cost and would compromise the achievement of a comprehensive, sustainable and efficient urbanisation pattern for the wider structure plan area that meets the principles set out by the RPS.

8.2. Transport Effects

Application

136. Transport effects of PPC51 are summarised in section 6.9 of the AEE and discussed in more detail in the Integrated Transport Assessment (ITA) prepared by Commute Transportation Consultants (Attachment 7 to the application).

137. Transport demands for the plan change area and surrounding Drury West were forecast in an ITA as part of the structure plan work. The structure plan ITA followed a hierarchical structure comprising two interconnected components – the Macro Strategic Model (MSM) which relates land use to travel patterns at a regional level to derive overall travel demands, and a mesoscopic project model (SATURN) which applies regional demands to analyse traffic in more localised detail. The outputs of the SATURN model were used to determine the level of transport upgrades required in the area. The requestor's ITA provides a revised estimate of the traffic generation from this area based on the zones sought through this plan change and the consented and proposed development in Drury 1 precinct. Compared to the land use assumptions within the MSM, the anticipated residential households numbers within MSM Zone 561 (which includes PPC51) are 16% greater, and around twice the number of jobs are anticipated once consented and planned development within the Drury 1 Precinct and PPC51 are considered. However, the ITA states that more trips are expected to be internalised due to the local employment opportunities within the BTC zone. Commute Transportation Consultants consider the conclusions reached by the previous ITA are still valid. No traffic modelling of the proposed development was undertaken for the report.
138. No public transport services currently pass by the PPC51 area. There is a local bus service from Drury town centre to Papakura. The nearest train station is at Papakura, approximately 6.5km away. The ITA states that improvements to public transport are proposed by SGA as the area grows. These include a bus Connector service along SH22 and FTN along Jesmond Road and Bremner Road. The new Drury West Train Station will be located south of SH22 (updates to this location since the ITA was prepared are set out in section 2 of this report).
139. The ITA identifies specific transportation improvements considered relevant to this plan change, noting that the neighbouring Drury 1 precinct has already completed some of the transportation improvements required for the development of that area. These are:
- Upgrade of the Jesmond Road / SH22 intersection to either roundabout or signals (interim intersection improvements already undertaken)
 - Collector road connections from the plan change area with signalised intersection of realigned Burberry Road, SH22 and McPherson Road
 - SH22 upgrade to four lane urban road with associated signalised intersections and pedestrian / cycling facilities (likely completed in stages)
 - SH1 Papakura to Drury South (six lanes plus shared path)
 - Electrification (Papakura to Pukekohe) and construction of rail station in Drury (Drury west)
 - Pedestrian / cycling links to Rail station
 - Bus network upgrade linking PPC51 area to the Drury train stations
140. The AEE states that in general, the last five projects are required to meet the wider growth area and as such are not specifically required for or triggered by development of the PPC51 area. It concludes that the objectives, policies and rules in the AUP (as modified by the plan change) will be sufficient to ensure that development within the PPC51 area is supported by adequate transportation connections and infrastructure.
141. The precinct plan (see Figure 10 above) identifies a proposed roading network for the plan change area as follows:
- the southern half of Burberry Road being realigned to run north-south, now meeting SH22 at the McPherson Street intersection, which is to be upgraded to a signalised intersection. Burberry Road is to be upgraded to urban collector standard;
 - a new collector road running east-west through the middle of the plan change area with a new connection into the existing intersection of SH22 and Great South Road;

- another new collector road along the northern boundary of the plan change area;
- two town centre local roads through the town centre zone with building frontage controls applying (one of which meets SH22 at a new left in/left out intersection);
- another local road along part of the western boundary of the plan change area.

142. This roading layout is similar to that shown on the Drury-Opāheke Structure Plan.

143. The plan change does not propose specific roading cross sections and relies on Auckland Transport's Code of Practice to determine the cross sections of new roads. However, as shown on the precinct plan, all collector roads and local roads excluding the central town centre local road will include on-road cycle facilities and a 3m shared path on at least one side of the road. The precinct standards also discourage any vehicle access from sites across shared paths.

Peer Review

144. Mat Collins, Flow Transportation Specialists has reviewed the transportation aspects of the proposal (**Appendix 4**). This review was undertaken prior to expert transport conferencing and the amended ITA being prepared.

145. Mr Collins notes the new Drury West train station location and the proposed town centre in PPC51 are approximately 1,300m apart via existing and potential future roads, compared with the approximately 700m distance expected based on the previous indicative location of the Drury West train station on the Drury-Opāheke Structure Plan. This distance of approximately 1,300m means the plan change is unlikely to result in integrated land use and transport outcomes, as it will preclude the majority of walking trips (a walkable catchment generally being regarded to be around 800m). Further, frequent bus services between the Drury West or Central train stations and proposed town centre are not anticipated, as the FTN network will be on Jesmond and Bremner Roads, consistent with Auckland Transport's lodged NoRs. Therefore the proposed town centre is not well located from a transport accessibility and connectivity perspective.

146. Mr Collins agrees on the local and wider area transport network upgrades identified by Commute Transportation Consultants as being critical to ensuring the transport demands of PPC51 can be met. Of these improvements, he considers two key improvements need to be in place prior to any development within the precinct:

- The upgrade of SH22 to a four lane urbanised arterial road, between Drury Interchange and the western-most precinct intersection to SH22. In the absence of any traffic modelling being provided in support of PPC51, Mr Collins disagrees that the upgrade of SH22 is not required specifically in relation to this plan change. He recommends that SH22 is urbanised and upgraded to four lanes between Drury Interchange and Jesmond Road before the occupation of any building within the PPC51 area.
- The realignment of Burberry Road, closure of existing Burberry Road/SH22 intersection and opening of the new safe intersection. Burberry Road must also be urbanised in full prior to any connection being made to Drury 1 precinct.

147. Mr Collins considers that the AUP provisions in combination with the precinct provisions currently proposed will not secure these upgrades, i.e. once rezoned, significant development can occur without triggering any requirement to assess effects on the transport network. Amendments to the proposed precinct provisions are therefore required.

148. In terms of the local transport network for the PPC51 area, Mr Collins recommends that the town centre local road also needs to be identified on the precinct plan as catering for cycling and public transport modes. He also recommends that the legend state the roads have 'provisions for cycling and walking' rather than predetermine the cross section of the roads by describing a 3m shared path, as this is too prescriptive and can create future issues.
149. As the east-west collector road through the middle of the precinct is located south of the structure plan location, a high-level feasibility study is recommended to be undertaken to confirm this collector road could be extended to the west to Jesmond Road. The local road along the western boundary of the plan change area is interrupted by land parcels outside the plan change area, and Mr Collins recommends the alignment of the road is altered to sit within the precinct.
150. The precinct plan legend identifies that two new intersections on SH22 (Town Centre Local Road and east/west Collector Road) are to be provided 'by others'. Mr Collins recommends that this reference is removed in the absence of confirmation from Waka Kotahi that it has funding for, and agrees responsibility to provide, these new intersections.
151. In the absence of further design assessment to confirm intersection form, Mr Collins recommends that the three new intersections with SH22 as shown on the Precinct Plan are not identified as "signalised" in the Legend.
152. In the absence of further design assessment and approval from Waka Kotahi regarding the location of the three new intersections on SH22, Mr Collins recommends a new Special Information Requirement is included in the Precinct Provisions as follows:

IX.9.X Special information requirements

(1) Any new road access to SH22 shall be supported by a Transport Assessment Report and Road Safety Audit, prepared by a suitably qualified transport engineer in consultation with Waka Kotahi NZ Transport Agency, confirming that the location and design of the intersection supports the safe and efficient function of the transport network.

Comments

153. Mr Collins' comments on the proposal's limited integration between transport and land use have been taken into account in forming my position of not supporting the proposed BTC zone (section 8.1 above). I note that a town centre outside of the PPC51 area, closer to the train station, will still have the same positive transport effect of providing local jobs, services and other facilities for residents thereby reducing the need to travel out of the area.
154. The remainder of Mr Collins' assessment is applicable regardless of the urban zoning to be applied to the PPC51 area.
155. **Note:** Following Mr Collins' report and expert conferencing, an updated ITA is being prepared on behalf of the requestor. This is to include updated trip generation, intersection assessments and public and active transport networks. Due to this being completed shortly before publication of this report, it is unable to be addressed within the report.

156. In section 2.6 above I set out the transport infrastructure upgrades required to support the urbanisation of the Drury West area, and their status and funding. While funding has not been established for some of the wider network upgrades (FTN and SH22 upgrades), these are now subject to NoRs which indicate an intention for implementation and funding by 2028. Council is also working on the potential use of Infrastructure Funding and Financing Act 2020 mechanisms to fund infrastructure in Drury.⁶ Overall, I expect funding will be allocated for all of the required upgrades by 2028.
157. However, there remains some risk that the delivery of the infrastructure could be delayed beyond 2028. There is also the question of whether a 'live' urban zone is appropriate now, given a key transport network upgrade is potentially 10 years away from completion. The AUP RPS Infrastructure and Transport provisions (B3.2.1(5), B3.3.2(5)) require that transport infrastructure planning and land use planning are integrated to service growth efficiently. However the ITA may find that the full SH22 upgrade to four lanes is not required in order to manage the transport effects of the plan change. A suitable interim solution may be possible for SH22 which ensures that both sufficient vehicle capacity and safe walking and cycling facilities are provided between Jesmond Road and SH1.
158. I expect that following a 'live' urban zone being applied, the planning, consenting, enabling works, subdivision and building processes for the land would take a number of years before development would be ready to occupy. The rezoning would allow these processes to take place in the interim.
159. Upon the current information, I recommend that a threshold/trigger provision be added stating that no buildings may be occupied in the PPC51 area prior to SH22 having been upgraded to an urban standard with four lanes and provision for active transport facilities. This could be added into proposed Standard IX.6.2.1 Transport Infrastructure Requirements. In my opinion this would manage the integration of development with transport infrastructure as required by AUP RPS Objective B3.2.1(5), allowing some progress to be made on development, but avoiding adverse safety and transport effects resulting from the occupation of development before the infrastructure is in place. It also provides for flexibility if the funding and timing situations for the SH22 upgrade change.
160. I agree with Mr Collins that the realignment of Burberry Road and a new, safe intersection with SH22 before development occurs is not fully achieved by the notified precinct provisions that require compliance with the precinct plan, as the northern part of the precinct could be developed in accordance with the precinct plan without this having taken place. Therefore I also recommend adding this upgrade into proposed Standard IX.6.2.1:

Transport Upgrade	Trigger
<i>The intersection of SH22 and Jesmond Road must be upgraded with a double lane roundabout with approach lanes, or traffic signals (including approach lanes) where the posted speed limit supports their implementation to provide a safety and capacity solution, unless an interim traffic safety solution has been approved by the New Zealand Transport Agency</i>	<i>Any new lot; or prior to the occupation of any new dwelling or town centre activity in the Precinct Plan area.</i>

⁶ Item 11, Finance and Performance Committee meeting minutes 17 June 2021

<i>as the requiring authority for State Highway 22.</i>	
<u><i>SH22 must be upgraded to an urban standard with four lanes and provision for active transport facilities between Jesmond Road and SH1 Drury Interchange</i></u>	<u><i>Prior to the occupation of any new building in the Precinct Plan area.</i></u>
<u><i>The intersection of SH22 and Burberry Road must be relocated in general accordance with the Drury 2 precinct plan, and the existing intersection of SH22 and Burberry Road must be closed</i></u>	<u><i>Prior to the occupation of any new building in the Precinct Plan area.</i></u>

161. I note that the Waka Kotahi NoR does not contain provision for intersection upgrades and new intersections to SH22, and I agree that the precinct plan should not refer to the form of the new intersections or that they are to be undertaken 'by others'. I support the special information requirement recommended by Mr Collins for any new road access to SH22, and note that this is consistent with Waka Kotahi's submission. I also agree with Mr Collins' recommendations in terms of amending the roads shown on the precinct plan and the labels in the legend.
162. In relation to the feasibility of extending the collector road to the west, I agree that it is important that this connection to Jesmond Road can be made. I note that the subdivision provisions in AUP Chapter E38 allow scope for consideration of this matter. For example, Policy E38.3(10) requires that a road network be connected between adjacent land areas, and Policy E38.3(19) that infrastructure servicing should enable the existing network to be extended to adjacent land where that land is zoned for urban development. However I consider there would be benefit to making the enablement of an onwards link to Jesmond Road a specific consideration for subdivision creating the collector road, by way of a precinct-specific provision.

8.3. Effects on Other Infrastructure

Application

163. The proposed servicing of the plan change area is summarised in section 6.7 of the AEE and discussed in more detail in the Engineering report prepared by McKenzie & Co Consultants (Attachment 5 to the application).
164. Currently, the PPC51 area is not serviced by a wastewater network. However, provision has been made within the Drury 1 Precinct to cater for future urban development with the construction of a Trunk Wastewater Sewer with an associated connecting network. This trunk sewer will need to be extended to service the plan change area and future up-stream catchments. Two wastewater pump stations have been/are being constructed within the Drury 1 precinct which can partially service the Drury 2 precinct. A new wastewater pump station will be required within the plan change area.
165. The PPC51 area is currently not serviced by water. A bulk supply point off the existing watermain at 103 Flanagan Road has been installed to service the future development at Drury. A water main is currently being installed through Drury 1 precinct, and this can be extended south to Drury 2 precinct. Funding for water infrastructure is proposed through development agreements between developers and operators which address cost sharing.

166. Power and telecommunications infrastructure can be extended from Drury 1 precinct to the north. Gas is not proposed to be provided in the plan change area. The protection of the gas transmission pipeline running through the plan change area is proposed to be achieved at subdivision/earthworks/development resource consent stage in engagement with First Gas.

Comments

167. Servicing has not been identified as a constraint on the timing or form of rezoning for the PPC51 area. Specific submissions from Watercare, Spark, Counties Power and First Gas are addressed in section 10 below.

8.4. Urban Design Effects

Application

168. An Urban Design Assessment (UDA) has been prepared by Ian Munro (Attachment 8 to the application) and summarised in section 6.11 of the AEE.
169. The UDA states that the proposed zone configuration is considered to be consistent with the patterns generally seen across Auckland under the AUP and envisaged by the AUP, whereby a centre is the focal point of development, with a supporting THAB zone around that, fading outwards again to a lower order zone (in this case the MHU zone in the north), to directly tie into existing zoned land. The placement of the centre and its main street on the realigned Burberry Road will mean it will act as something of a gateway into Drury West. The zone framework proposed will result in a high-quality built form outcome that is consistent with the principles of a Transit Oriented Development.
170. The Drury-Opāheke Structure Plan does not identify a particular role or type of centre for Drury West, but has identified an area of 15.74ha, identifying it as a relatively large centre. The UDA states that a BTC zone (with a 27m height limit) has been proposed in PPC51 on the basis that it more readily enables the activities needed by a community of between 18,000 – 25,000 persons (such as supermarkets, department stores and large offices), and allows the density benefits of being near a (future) rail station to be maximised. This makes it more efficient and effective than a Business: Local Centre Zone, and likely to maximise economic development and the creation of employment. Mr Munro considers the proposed town centre to be in the optimal location for Drury West.
171. Mr Munro's assessment also sets out why he considered that the Drury West Train Station was best located as eastwards as possible, and states that the proposal is aligned with the Council's preferred rail station and connectivity outcomes. While the latest train station location was not announced at the time the UDA was written, Mr Munro considered that if both the station and centre were further west and south of SH22, the centre itself would potentially reduce to a small convenience retail centre serving a relatively small local population of commuters (paragraph 5.8(k) of the UDA). He has stated that it is not essential that the centre and station adjoin, but there will be a functional benefit if they are within a convenient walk of one another.
172. The UDA also sets out that the proposed road layout has been derived through detailed master planning identifying an optimal street structure, aligning roads for solar orientation and to also enjoy convenient access for customers.

173. The AUP's existing zone provisions and consent requirements are to be relied on, supplemented by the transport requirements set out in the Precinct and the Key Retail Frontage and General Commercial Frontage controls. These would require resource consent to be obtained for all new buildings (in the THAB zone and BTC zone), with design quality along streets a key consent matter in all cases. This will ensure the key streets are visually interesting, safe, and contribute effectively to new urban amenity values. The lake will provide a unique amenity for the centre and give it a sense of place that will be distinctive in south Auckland's centres, helping to attract high-density development. Mr Munro does not consider any additional limitations or Precinct provisions are necessary on an urban design basis.
174. In urban design terms, Mr Munro has assessed that a town centre with building heights of up to 27m will not have problematic adverse effects on the environment, due to the separation distances from the BTC zoned land to third-party properties (outside of the FUZ), and the presence of major urban infrastructure and spatial barriers including SH22, SH1 and the Drury Interchange, and Great South Road bridge. The proposed town centre will be of a scale, extent and urban character commensurate with the scale of urban community planned for Drury West, ranging from 18,000 – 25,000 persons and based on medium to high density development across the approximately 1,000ha area.

Peer Review

175. Rebecca Skidmore, R.A. Skidmore Urban Design Ltd, has reviewed the Urban Design Assessment (**Appendix 4**).
176. Ms Skidmore considers that the proposed zone configuration is consistent with the Drury-Opāheke Structure Plan. She considers the BTC zone, as opposed to a different 'centre' zone, is appropriate to perform the function and accommodate the mix of uses anticipated by the structure plan for a centre in Drury West.
177. However, confirmation of the rail station location is a critical element that impacts on the suitability of the proposed zone structure. In Ms Skidmore's opinion, the rationale for the Town Centre location is severely weakened if the station is located west of Jesmond Road, as there are already challenges to providing good active mode connectivity between the station and the centre if the station is east of Jesmond Road. These primarily relate to the barrier created by SH22, the topography and the challenges to achieving land-use activation between the two areas.
178. Since the preferred rail station location is west of Jesmond Road, the ability to establish additional business and commercial activity to directly integrate with the rail station could be compromised. This would not achieve the policy direction set out in the AUP RPS of achieving integration between land-use and transport in a way that reduces demand for private vehicle trips. In Ms Skidmore's opinion, the relationship of a new town centre to and integration with the planned passenger rail service is critical to achieve the quality compact urban form sought by the RPS.
179. Therefore Ms Skidmore considers it would be more appropriate to locate a BTC zone immediately adjacent to and directly integrated with the new proposed Drury West train station (which is different to the structure plan and not what is being proposed by PPC51), and to locate a Business: Neighbourhood Centre zone or Business: Local Centre zone within the PPC51 area to serve the surrounding residential catchment. Further analysis would be required to determine the most appropriate location and extent of this zone.

180. In relation to building heights, Ms Skidmore considers insufficient analysis has been provided as to why 27m is an appropriate building height for this location. There is a lack of modelling showing the way buildings of this height would relate to the topography of the site and the likely typologies and how the achievement of the key retail frontages, supporting the role of these streets as having a key pedestrian focus would be achieved.
181. In the absence of further analysis, and considering the role of this area in relation to the surrounding context, Ms Skidmore considers a height variation control of 19m with 2m enabled for roof form (resulting in a maximum height of 21m) would be more appropriate for the BTC zone, if it was considered to be appropriate in this location.
182. Ms Skidmore agrees that the lake is an important amenity feature that contributes to the rationale for the BTC zone location and has the potential to make a positive contribution to the quality of urban environment and its distinctive sense of place. However, she notes there is little in the precinct provisions to reinforce its role as a key feature in the urban environment. The lake is depicted on the Precinct Plan and it is referenced in Policy IX.3(2)(e), but there are no specific precinct rules or assessment matters.
183. In Ms Skidmore's opinion, in order to achieve the amenity function described in the UDA, the lake should be used as a key structuring element for the urban environment and good public access should be provided to and around its edges and surrounding development should provide a positive interface. This could be achieved through expanding the Precinct description, policy framework, assessment matters and criteria for subdivision and development and new buildings to emphasise the role this feature plays in contributing to the amenity and sense of place for the evolving town centre.
184. Ms Skidmore has also commented on open space provision, which I have discussed in the social effects section below.

Comments

185. I agree with Ms Skidmore's assessment that the proposed town centre location is not appropriate, and have set out my assessment of this in section 8.1 above.
186. I note that the UDA was prepared prior to the latest SGA preferred train station location being announced, and this change has a potential impact on the assessment undertaken. For example, paragraph 5.11 of the UDA states: *"The KDL proposed town centre is not likely to be a retail-dominated centre but a destination offering amenity values, shopping, living, and working opportunities. Achieving this outcome requires a strong connection to all of the centre's residential, employment and rail station catchments."* However, I expect other factors identified in the UDA as supporting the centre location may remain applicable, such as location in relation to residential catchments, key arterial roads, and the convergence of likely patterns of movement. These factors would also support a smaller alternative centre zoning. Based on the expert conferencing session (2 July 2021), I understand the requestor continues to pursue a BTC zoning.
187. I recommend that the 27m Height Variation Control be removed from PPC51 along with the BTC zone. Should the BTC zone be approved, I recommend that the Height Variation Control be amended to 21m.
188. As suggested by Ms Skidmore, I consider that a lower-order centre on the PPC51 land could appropriately serve the convenience retail requirements of the Drury West area. The potential nature of this centre is considered in the economic analysis section below.

189. I support Ms Skidmore’s recommendations to include additional provisions relating to the role of the lake as an amenity feature, regardless of the zoning applied. The lake is unique to the precinct, so is not directly covered by other AUP provisions. I suggest the following additional matter of discretion and assessment criterion be applied to subdivision and development applications within the precinct:

The quality of the interface created to the lake amenity feature

Whether the subdivision layout and/or development design creates a high quality interface with the lake and provides for visual connections to and physical connections to and around the lake

190. I would also recommend Policy IX.3(3) in relation to urban amenity outcomes be amended to include reference to the lake interface, although this policy would need to be substantially redrafted if BTC zoning was not included in the Drury 2 precinct.

8.5. Economic Effects

Application

191. Economic effects of PPC51 are summarised in section 6.10 of the AEE and discussed in more detail in the Economic Analysis prepared by Urbacity (Attachment 12 to the application). The assessment identifies that a BTC zone, along with its ability to establish a range of retail and services (including a supermarket and department stores) is needed to support the social, cultural and economic wellbeing of the residents and employees of Drury West. The location of the town centre is consistent with the Drury-Opāheke Structure Plan, and reduces the need for Drury West residents to commute through Drury and the Drury Interchange to meet their daily needs at a Drury East centre or Papakura.

192. The BTC zone rules are not proposed to be modified in any way to direct the specific types of activities that can occur. However from the analysis it is envisaged that the centre will begin as a supermarket, specialty shops, food and beverage services and personal and professional services, and ultimately should grow to include offices and high density residential. The economic analysis by Urbacity states that the centre is proposed to be employment-heavy, not retail dominant. About 900 jobs have been estimated for the town centre land in this report (about 200 higher than the ITA’s estimate). The projected retail space estimates are shown below:

	2021-2022	2035	2048
<i>Auranga Town Centre Space Estimates</i>	Est GLA	Est GLA	Est GLA
Est'd Town Centre Floorspace Sequence	7,000-10,000	10,000-15,000	25,000-30,000
- 1 supermarket plus specialties and services	3,500+/-		
- 1 more supermarket plus specialties and services		3,500+/-	
- 1 or more department stores plus specialties and services			6,000+/-

193. The economic analysis states that the new town centre is assessed to primarily serve growth in Drury West rather than draw in residents from other catchment areas (serving an estimated 12,700 dwellings/33,000 people by 2048). It is therefore not considered to threaten Papakura Metropolitan Centre or Pukekohe. Not all of the demand for retail within Drury West catchment will be serviced by the new town centre, and the remainder will go elsewhere.

194. The analysis states that the existing Drury local centre will benefit to an extent from population growth in Drury West. However growth in Drury West and East may require modification of the mix of the Drury local centre in future.
195. The economic analysis places importance upon the proposed town centre being able to form part of a Transit Oriented Development, and connecting well to the Drury West train station location (via a realigned Burberry Road to McPherson Road). In future, it is anticipated that further employment activities would occur on the southern side of SH22 between the plan change area and the train station. To be more sustainable, the analysis states that the station should function as an inbound station for employees as well as an outbound station for residents. It is also important to reduce trips altogether by providing employment for residents.

Peer Review

196. Tim Heath, Property Economics has reviewed the economic aspects of the plan change (**Appendix 4**).
197. Mr Heath considers that one town centre is required in Drury West to assist in providing frequently required retail activities and commercial services. He agrees with the benefits of the town centre identified in the Urbacity report (including increasing levels of self-containment south of the city, reducing trips and travel times south, meaningfully increasing economic value and capacity south of the city, and bringing a sense of civic to the south through a mixed-use town centre). He notes these are not site or development specific benefits, and are equally likely to be generated by the Drury East metropolitan centre or an alternative Drury West town centre location. He also considers that the proposed BTC zone satisfies the objective of the BTC zone from an economic perspective, as would any centre with this range of activities and size in Drury West.
198. Mr Heath agrees that the size of town centre proposed is appropriate for serving the Drury West catchment. The commercial extent of the BTC zoned land (once the lake, streets and public space is removed) at around 7ha is similar to what Mr Heath previously determined to be appropriate for a single Drury West centre, when preparing the 2018 economic analysis report which informed the Drury-Opāheke Structure Plan. He also considers that a town centre of the proposed size will not adversely affect the economic viability of other existing centres in the wider area, beyond ordinary trade competition effects.
199. Mr Heath has considered the implications of the preferred location for Drury West train station, noting that the Urbacity report places a meaningful reliance on employment benefits in relation to ability to unlock the economic capacity of the land in and around the proposed rail station. He states that the new train station location circa 1km west of the proposed town centre would diminish employment densities, albeit the exact quantification of by how much has not been determined. Mr Heath states that the town centre's economic viability would not be materially affected by the train station location, as he does not consider it relies on public transport passengers to be viable. In his view the extent and type of retail provision in the centre would not be materially affected, but the distance to the train station would likely affect the willingness of a few commercial or professional services activities to locate in the town centre. Adverse implications for accessibility may be more impactful on civic and community uses, which are likely to have a greater proportion of patronage derived from public transport infrastructure.

200. From an economic perspective Mr Heath states that the Drury West market can support a single new Town Centre zone in Drury West. The location of that zone is optimally combined with the train station to give the centre the best chance to maximise employment densities and link with the public transport initiatives (bus and rail) proposed. However, the lack of a direct train station connection does not render the proposed PPC51 town centre unviable, but dilutes the economic opportunity and benefits associated with it for the community.
201. In terms of other locational factors, Mr Heath considers that direct profile and access from SH22 (via a connector road) is important for the Drury West town centre. Proximity and profile to SH1 is not considered relevant, as the centre is not designed to service SH1 drive-by traffic.

Comments

202. Being outside of the walkable catchment of the Drury West train station as well as over 500m from the FTN bus route, the PPC51 land is not a convenient location for people to access via public transport. This makes it less likely that it will attract some forms of employment, and less likely to become a cultural and social focal point as sought by AUP RPS Policy B2.2.2(6), with the 'commercial' aspect of the focal point diluted, but still achieved.
203. I note that the AEE states that office and executive positions are considered feasible only if the combination of a high amenity town centre, industrial park, residential area and railway station all co-exist in close proximity (paragraph 3.1.13(d)), which is consistent with the above comments.
204. As assessed by Mr Heath I consider that the size and function of the proposed town centre would avoid or minimise adverse effects on the function, role and amenity of other centres (beyond those effects ordinarily associated with trade effects on trade competitors). It would thereby give effect to Policy B2.5.2(4)(c) of the AUP RPS.
205. As set out in section 8.1 I do not support the proposed BTC zone, which is partially informed by Mr Heath's review as well as other technical reviews and statutory matters. In considering the alternative appropriate centre zoning for the PPC51 land, I refer to the Economic Analysis provided by the requestor that indicates one supermarket is likely to be required within the next 5-8 years and 7,000-10,000m² Gross Leasable Area (including one supermarket plus specialities and services) is estimated in the next ten years. I have analysed the centres zones in section 10.1.5 below. The Business: Local Centre zone provides for supermarkets of up to 2,000m² with a restricted discretionary consent required for larger supermarkets. While no detailed alternative zoning proposal and analysis has been put forwards, it appears that the Business: Local Centre zone would suitably meet the short-term needs of the residential catchment.
206. With my recommended threshold provisions that would prevent the occupation of any new buildings until after SH22 is upgraded (expected to be by 2031), I do note that a local centre may not in fact be able to operate in the short term. However, the threshold provisions are subject to change after the updated ITA is prepared.
207. A smaller convenience centre will not create the employment benefits of a larger town centre, including for the local residents. However, I understand that many of these jobs were envisaged to be created over the longer term rather than the next ten years. There is sufficient time for an alternative town centre to be zoned in Drury West which would provide the same employment benefits.

8.6. Ecological Effects

Application

208. Ecological effects of PPC51 are summarised in section 6.6 of the AEE and discussed in more detail in the Ecological Assessment prepared by RMA Ecology (Attachment 10 to the application). The AEE also refers to ecological reporting undertaken for the Drury-Opāheke Structure Plan.
209. A large pond (approx.1.2 ha in area) is the main freshwater feature in the plan change area. The pond has a clay and sand base and riparian margins planted with predominantly exotic species. The pond is predominantly open water (as opposed to being vegetated). Approximately 965m of watercourses identified in the plan change area include a permanent stream reach, intermittent streams, ephemeral streams, artificial watercourses and ponds. The left arm of the Ngākoroa Stream also forms part of the eastern boundary of the PPC51 area. One wetland is present adjacent to Ngākoroa Stream and 15 Burberry Road, approximately 650m² of which is within the plan change area. Not all watercourse locations have been accurately identified at this time (due to land access constraints). The watercourses map from the report is included as **Figure 11** below.



Figure 11: Watercourses map from RMA Ecology report

210. RMA Ecology has concluded that the aquatic ecology values range from low to moderate within the PPC51 area. “Stream H” to the west of the lake is the only permanent stream identified on the land. A Stream Ecological Valuation was undertaken within “Stream H” confirming that this stream has moderate ecological value. There are no streams that qualify as ‘high’ or ‘very high’ ecological value.
211. Due to the degraded nature of watercourses within the area, aquatic species present are likely to consist predominantly of pollution tolerant and common (non-threatened) species. No rare or threatened aquatic species are likely to be present given the level of modification of the landscape and biological components within it.
212. The AEE states that the stream protection rules in Chapter E3 of the AUP will provide appropriate protection to streams, whether or not they are identified or illustrated on the precinct plan. The proposed precinct provisions will require the planting of all streams with riparian vegetation of 10m in width.
213. Within the PPC51 area, the Ecological Assessment states that indigenous vegetation is very scarce. Native trees and shrubs are predominantly within shelter belts and hedgerows, or as small copses bordering ponds or amenity garden area. Of the hundreds of trees and shrubs present within the sites, only a small percentage are native species, and all have been planted, rather than being relic trees from original indigenous vegetation communities. Approximately half of the exotic trees are conifers.
214. Birds observed within the plan change area include common cosmopolitan native and exotic species – nothing rare or threatened. No native lizards were found during targeted searches, but there are potentially copper skink (not threatened native lizard). Overall, the assessment found that the site supports very few native plant, bird or other likely land-based indigenous ecology values.
215. The PPC51 area does directly adjoin a terrestrial SEA (SEA_T_530) which is located along the Ngākoroa Stream edge and has been identified by Council to contain nationally and regionally threatened vegetation and bird species. Existing AUP rules in Chapter E15 and s230 RMA will apply along the edge of the Ngākoroa Stream requiring a 20m esplanade reserve, and the AEE states that no further rules are considered necessary.
216. Ecological values are also affected by stormwater and sediment runoff and treatment, and the Ngākoroa Stream drains to a marine SEA (SEA_M1_29b). The AEE states that adherence to the existing AUP provisions for earthworks (E11 and E12) and SMAF1 overlay provisions (E9 and E10) in conjunction with the Stormwater Management Plan recommendations will ensure that effects from these activities on freshwater systems can be appropriately managed.

Peer Review

217. Freshwater ecology effects have been peer reviewed by Connor Whiteley, Specialist – Freshwater Ecology, Auckland Council, now at Beca (**Appendix 4**). Mr Whiteley agrees that provided the rules of the NES-FW and Chapter E3 of the AUP are correctly applied, no further rules within the precinct provisions are necessary for freshwater-related works. The AUP will give effect to the NPS-FM 2020, and the NES-FW will apply to future resource consents.
218. The applicant has identified a number of waterways within the catchment, but did not identify every watercourse. The stream classifications are indicative given access limitations. Mr Whiteley is concerned that if the current stream locations and

classifications are included within the precinct plan, these will be applied in future without any further assessment being undertaken. Therefore, Mr Whiteley recommends that either a full and accurate streams assessment be provided, or that the mapping and protection of all freshwater features is left until the resource consent stage.

219. Mr Whiteley also seeks that the riparian margin planting requirement in Standard IX.6.4(2) be upgraded to require 20m riparian planting along either side of all permanent streams and 10m for intermittent streams, in alignment with Auckland Council's Technical Publication 148, and RPS Objectives B7.2.1(2), B7.3.1(1) and B7.3.1(3). He states that walkways and cycleways could occupy part of the 20m riparian zone where part of a reserve or open space area.
220. With the above two recommendations actioned, Mr Whiteley can support the proposed plan change from a freshwater ecology perspective.
221. Terrestrial ecology effects have been peer reviewed by Carl Tutt, Ecologist, Auckland Council (**Appendix 4**). Mr Tutt considers the report is largely adequate in its description of effects.
222. The exception to this is that bats have been excluded from the assessment, despite the presence of potential roost trees and nearby bat records. Chapter E15 of the AUP protects riparian margin vegetation, but some of the potential roost trees are outside of riparian margins. Mr Tutt considers there is no surety these trees will be considered or protected at resource consent stage, and this is inappropriate for the potential habitat of a threatened species.
223. The New Zealand Dabchick, an at-risk – recovering species has also recently been identified at the pond at 6 Burberry Road. Further assessment at the development stage would be required to determine the effects of the development on this species along with any mitigation measures (habitat retention and enhancement, lighting restrictions etc) to ensure that the species can continue to successfully utilise the onsite habitat.
224. In the absence of sufficient assessment of bats at plan change stage, and in light of the presence of the Dabchick, Mr Tutt recommends the addition of a new standard requiring an Ecological Management Plan containing ecological surveys of bats, birds and lizards as part of any subdivision. This will identify any significant habitat under Chapter B7.2 of the RPS that needs protection.
225. Mr Tutt also considers that the riparian planting standard should require the enhancement or creation of habitat for threatened species within riparian margins, and that the policy IX.3(6)(b) should require biodiversity enhancement planting of riparian margins. This is in line with AUP objectives B7.2.1(2) and E15.2(2), and the desired outcomes of the Drury-Opāheke Structure Plan, specifically the retention or creation of areas of rank grass or low growing native vegetation to provide habitat for native skinks. It is also consistent with the objectives in Te Mana o Te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020. He has also commented on riparian planting widths, supporting an average of 20m for wetlands and the lake feature and minimum of 10m for permanent and intermittent streams.

Comments

226. I agree with Mr Whiteley that there is a risk that the indicative stream classifications and watercourse locations are not entirely correct and that further assessment needs to be undertaken. In my opinion the benefits of showing the streams on the precinct plan,

based on the best available information, outweigh this risk. I therefore consider that streams should be indicatively shown on the Precinct Plan, with a footnote that clarifies the level of assessment undertaken and the need for site-specific watercourse classification and delineation assessments to be undertaken and accompany any future resource consent application.

227. The appropriate width of riparian margins is a matter that involves a range of considerations, including ecological, amenity, natural hazard and infrastructure issues. I generally agree with Mr Whiteley that there would be benefits to a 20m wide planted riparian area, but I note that 10m riparian planting would also achieve enhancement benefits. The AUP does not contain an explicit rule on the required width of riparian planting, but controls vegetation removal within 10m of urban streams and 20m of rural streams and wetlands.
228. My recommendation is to maintain the requirement for a minimum 10m wide planted riparian margin along streams. I note that along the key corridor of the Ngākoroa Stream, esplanade reserve requirements of 20m will apply, which will allow space outside the planted area for walkways, cycleways and wider planting. A 20m riparian yard (building setback) should also apply to the Ngākoroa Stream in case development precedes subdivision.
229. I understand that a 30m yard (building setback) will apply around the lake. The proposed precinct provisions do not include a planting requirement for the lake, although this requirement is mentioned in proposed Policy IX.3(6)(b). I suggest a 20m average planting width, as recommended by Mr Tutt.
230. I agree that there is no explicit requirement in the AUP to consider bat roosting potential before removal of trees outside riparian margins, which can occur as a permitted activity under the AUP. I consider Mr Tutt's recommendation of an ecological survey requirement to accompany any subdivision consent application is an appropriate response in light of the potential ecological habitat values he has identified as present in the PPC51 area. This would give effect to AUP RPS Objectives B7.2(1) and (2) aiming to protect areas of significant indigenous biodiversity, and maintain indigenous biodiversity through protection, restoration and enhancement in areas where development is occurring. I note the survey work could tie in with the freshwater assessment also needing to be done before development, and the notable trees assessment discussed later.
231. I adopt Mr Tutt's recommendation to amend Policy IX.3(6)(b) as I agree the change is consistent with the biodiversity objectives of the AUP and the Drury-Opāheke Structure Plan.

8.7. Stormwater Effects

Application

232. Stormwater effects of PPC51 are summarised in section 6.1 of the AEE. A Stormwater Management Plan (SMP) has been prepared by Mackenzie & Co (Attachment 6 to the application). This is intended to align with the Auckland Council's Network Discharge Consent (NDC) requirements, with the objective of the stormwater discharges from the plan change area being adopted into the NDC. Policy 6 of the proposed precinct provisions requires subdivision and development to be consistent with any approved NDC and supporting SMP.

233. The existing AUP stormwater and flooding provisions will apply to the precinct, as well as the SMAF1 overlay provisions. The SMP identifies on-site retention for lots to reduce stormwater contaminants, volumes and peak flows entering the receiving environment, to control and treat rainwater where it falls at source, and to provide where possible opportunities for groundwater recharge and enhancement of base flows to streams.
234. Stormwater management options that may be utilised by future lots are expected to include rain tanks, permeable paving, raingardens and other communal devices. Devices will be assessed under the SMAF rules in Chapter E10 of the AUP at resource consent stage. High contaminant yielding uses (high use roads and high use car parking areas) will also be addressed at development stage in accordance with Chapter E9 of the AUP.
235. Existing drainage patterns for the land will be generally retained, with the northern catchment discharging into Stream A in adjoining Drury 1 precinct, and the southern catchment discharging into Ngākoroa Stream. The ultimate receiving environment for both sub-catchments is the Drury Creek, which is an SEA – Marine 1 and 2.
236. The flood hazard assessment has illustrated that the proposed development does not change existing flood hazards for buildings in the area or downstream. New development is proposed to be protected from future flood hazards by avoiding residential development within the 1% AEP floodplain and providing capacity for overland flow paths.
237. Overall, the report considers the proposed stormwater management options outlined in the SMP are practicable and consistent with the water sensitive design principles and SMAF approach of the AUP in managing stormwater and ensuring that the future developments can minimise and reduce effects on water quality.

Peer Review

238. Trent Sunich, 4sight Consulting, has peer reviewed the SMP (**Appendix 4**). His overall conclusion is that the proposed stormwater management methodology outlined in the SMP document and the objectives and policies in the proposed plan change, provide, at a high level, alignment with the AUP. In brief there is:
- Proposed integrated management of land use and freshwater systems by providing stormwater infrastructure implemented with assistance of catchment planning (B7.3);
 - Minimisation of the generation and discharge of contaminants in stormwater runoff through the proposed use of contaminant source control and water quality treatment devices (B7.4);
 - Implementation of hydrology mitigation to minimise or mitigate new adverse effects associated with stormwater running off impervious surfaces (E1(9)); and
 - Through catchment and development-based flood hazard modelling, avoidance of exacerbation of existing flood risk (E1(11)).
239. As the receiving environment is highly sensitive and an SEA, Mr Sunich supports a new standard relating to exterior materials on buildings as follows:
- Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.*
240. Associated new matters of discretion and assessment criteria would be required.

241. It is noted future stormwater diversions associated with the development would be permitted activities under Chapter E8 (A1) of the AUP, providing the development demonstrates compliance with the SMP document. Other land use related stormwater rules in the AUP, being E9 (Stormwater quality - High contaminant generating car parks and high use roads) and E10 (Stormwater management area - Flow 1 and Flow 2), and any associated land use consent requirements will still apply.

Comments

242. During the processing of recent plan changes for precincts in the southern area,⁷ I am aware that the AUP has been identified as containing inadequate provision for stormwater quality treatment for new development areas discharging to highly sensitive receiving environments. This applies to precincts even where the SMP has been agreed to in principle by Auckland Council's Healthy Waters. Healthy Waters has been involved in developing precinct provisions to adequately address these effects on stormwater quality. I am also aware that Healthy Waters has been in discussions with the requestors with a view to agreeing on revised stormwater provisions.

243. I agree with Mr Sunich's recommendation for a new standard and associated matters of discretion and assessment criteria to protect water quality. Having this standard would ensure inert building materials are required for the construction of individual buildings (land use consents/permitted activities which may not fall under the SMP). I have adjusted his wording to reflect the agreed wording for other similar recent precincts:

IX.6.X Building materials

New buildings, and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that do not have an exposed surface made from contaminants of concern to water quality (i.e. zinc, copper, and lead).

Matters of discretion for infringements to Standard IX.6.X Building materials

(a) Stormwater quality

Assessment criteria for infringements to Standard IX.6.X Building materials

(a) Stormwater quality

The extent to which development:

- (i) is in accordance with the approved Stormwater Management Plan and Policies E1.3(1) – (10) and (12) – (14).
- (ii) Implements a treatment train approach to treat runoff from all impervious surfaces so that all contaminant generating surfaces are treated including cumulative effects of lower contaminant generating surfaces.

244. I consider that policies in relation to stormwater quality should also be amended to support the new standard. This is further discussed in relation to submissions on stormwater in section 10.1.6 below.

⁷ PPC52 and PPC58

8.8. Social Effects including Open Space

Application

245. Social effects of PPC51 are assessed in section 6.3 of the AEE. This outlines that the neighbourhood of the plan change area currently has few social amenities other than the adjacent southern motorway, the Drury local centre and the Drury sports complex.
246. The proposed BTC zone allows for the development of retail, commercial and community activities. The AEE states that the BTC zone provisions are considered to be appropriate to enable activities to support social and cultural wellbeing for residents in the Drury West area.
247. At the time of the AEE report the Ministry of Education had purchased land for a primary school and high school to service the wider area (the primary school is already designated while the NoR is now lodged for the high school – see section 2.4 above). They indicated to the requestor that one more primary school is likely to be required for the area.
248. The Urban Design Assessment for the plan change states that there is no identified need for new open space on the site and the area is already serviced by two neighbourhood reserves proposed as part of the Drury 1 precinct. It states that a civic open space of some form will be developed in the town centre, and a high amenity area around the lake is proposed.

Peer Review

249. Robin Rawson, Xyst Ltd has reviewed PPC51 in regard to open space matters (**Appendix 4**). Ms Rawson notes that a neighbourhood reserve is shown within the PPC51 area on the Drury-Opāheke Structure Plan, but no open space provision is proposed by the plan change. The provision of a civic space in the town centre and 'high amenity area' around the lake are not illustrated on the precinct plan, and if provided would be potentially privately owned under the current proposal.
250. Using a 300m radius to approximate a 400m walk, Ms Rawson has assessed that the proposed neighbourhood reserve in the adjoining Drury 1 precinct to the north would adequately serve some of the plan change's residential catchment, but not the majority (23ha) (see **Figure 12** below). Ms Rawson therefore considers the proposal's provision of open space is not consistent with AUP RPS Objectives B2.7.1 and B2.7.2, as it does not adequately provide for the recreation and amenity needs of future residents. To address this issue, she recommends that a centrally located neighbourhood park should be identified on the precinct plan. She also recommends a new accompanying standard to restrict fence heights where fronting a neighbourhood park.
251. Ms Rawson also recommends that a civic space that provides a public open space function is identified on the precinct plan. Ms Skidmore has also commented in relation to her urban design review that the provision of an urban plaza as an open space focus within the town centre would be important, and it would be helpful to indicate a suitable location for it on the precinct plan to ensure the provision of such a space in an appropriate location is not lost, rather than relying on underlying zoning to deliver a space. However, such recommendations assume the land is zoned BTC (which I do not recommend).

252. The Drury-Opāheke Structure Plan identifies a blue-green network of indicative natural environment and paths following streams. While the proposed precinct provisions require riparian planting of stream margins, Ms Rawson notes they do not require any movement and recreational outcomes for the blue-green networks, and there is no assurance under the AUP that this will be provided at subdivision stage. This does not promote the physical connection of open spaces and enabling public access along streams. Ms Rawson therefore recommends that the blue-green network is identified on the structure plan, including pathways.

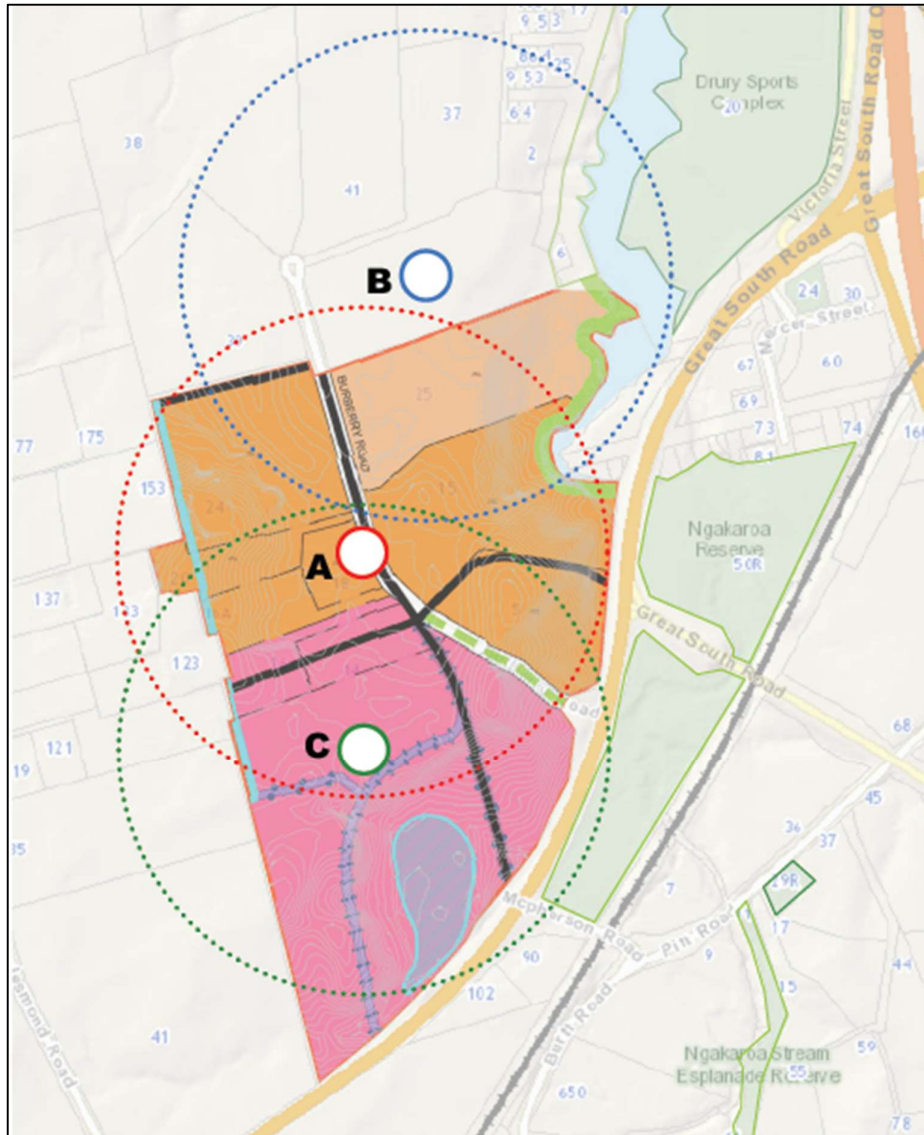


Figure 12: Neighbourhood park catchments overlaid on precinct plan
*A is the neighbourhood park indicated within PPC51 area in Drury-Opāheke Structure Plan.
 B is the neighbourhood park on current Masterplan for Drury 1 precinct on adjoining site.
 C shows a good location for a neighbourhood park if park 'B' is assured.
 Neighbourhood park catchment areas indicated by a dotted line with a radius of 300m.*

253. The esplanade reserve along Ngākoroa Stream is shown on the structure plan, but without a path alongside. The requestor's urban design assessment suggested a park edge collector road would be located alongside the esplanade reserve here that integrates with what is provided in the adjoining Drury 1 precinct, however no road is

shown on the precinct plan. Ms Rawson supports a requirement for a park edge collector road and pathway to ensure public access to and along the coast, and has recommended revised precinct provisions to that effect.

254. Ms Rawson considers it is unlikely that additional sports facilities would be needed within the plan change area.

Comments

255. During expert conferencing, planners for the requestor and Auckland Council (as a submitter) discussed that one civic space should be accommodated adjacent to the lake. The mechanism of delivering this was not agreed, as Auckland Council's planner favoured it being indicated on the precinct plan while the requestor's planner did not.
256. I agree that showing the indicative location of open space that is generally known to be required on the precinct plan is important to better secure this being delivered in an appropriate location through future subdivision. This assists to give effect to RPS Objective B2.7.1(1) - ensuring the recreational needs of the future residents are met. It would mean all parties would be clear on the requirements, and allows for the adjustment of the locations through the development process once further detailed planning and stream surveys are completed.
257. I therefore recommend, should the BTC zone be confirmed, that an 'indicative open space' be shown on the precinct plan in the location shown on Auckland Council's submission (see section 10.1.9 below). The need for an open space for an alternative BLC zone has not yet been considered by the relevant parties.
258. I do not recommend a second indicative open space be shown, as Auckland Council's parks representative did not accept that a neighbourhood park was required at the expert conferencing, so I am unsure whether this would in fact meet the Council's Open Space acquisition policy. Additionally, there is no specific submission seeking a second open space. However, this will not preclude such a space being provided through later development processes.
259. Should the open space be within the BTC zone (as currently proposed) or alternative BLC zone, I do not see the need for a fencing standard for adjoining sites, as these zones discourage residential activities at ground floor and have policies addressing the design of development positively contributing to public open spaces.
260. The blue-green network from the Drury-Opāheke Structure Plan is shown in **Figure 13** below. In terms of 'movement outcomes' for the PPC51 area, a greenway is indicated along the Ngākoroa Stream and along the SH22 edge of the PPC51 area to the lake. I recommend that the precinct plan be amended to notate the movement outcomes sought for the greenway. The provision of the greenway would give effect to AUP RPS Objective B2.7.1(2) and Policy B2.7.2(2) and (9), which seek to enhance public access along streams and promote the physical connection of open spaces. It would link into pathways provided in Drury 1 precinct to the north.
261. I also expect that pedestrian access to and around the lake feature will be promoted via the urban design provisions recommended in section 8.4, and the 30m building setback from the lake required by the yard standards (in the AUP zone chapters) will provide plenty of space for a pathway.

262. In relation to the park edge road sought by Ms Rawson along the Ngākoroa Stream, I agree that this would improve ease of maintenance and assist public access to the coast and walkway. However I consider that this matter is covered by existing AUP assessment matters contained in Chapter E38. Park edge road design would therefore be considered for all applications, but a specific design does not need to be mandated through the plan change.

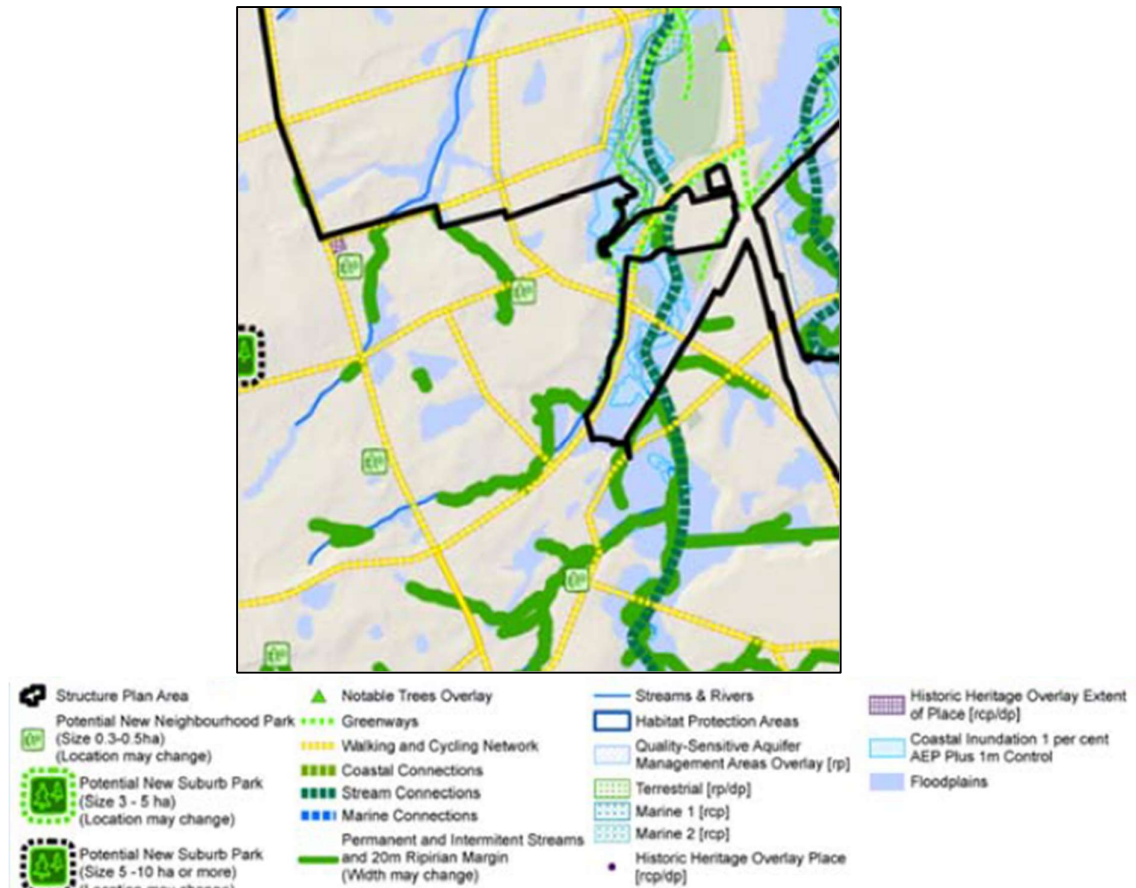


Figure 13: Blue-green network for the PPC51 area (Drury-Opāheke Structure Plan)

263. In summary I recommend that:

- Active transport provision be shown on the precinct plan for the esplanade reserve along the Ngākoroa Stream (outside any 10m riparian planting area).
- An indicative open space be shown on the precinct plan in the general location of the Auckland Council submission, should the BTC zone be accepted.

8.9. Landscape and Visual Effects

Application

264. Landscape and visual effects of PPC51 are summarised in section 6.5 of the s32 evaluation report and discussed in more detail in the Landscape and Visual Effects Assessment (LVEA) prepared by LA4 (Attachment 9 to the application).

265. The assessment states that this landscape is undergoing rapid change and development, with adjoining development works to the immediate north transforming the previously rural landscape to one of highly modified characteristics.
266. The PPC51 site has been assessed as a relatively degraded, modified rural lifestyle environment lacking any significant landscape features (other than the Ngākoroa Stream), has moderate natural character values (primarily focused around the Ngākoroa Stream), and generally relatively low visual amenity.
267. The proposed urbanisation of the PPC51 area will significantly change its current open rural landscape character. The development will however be consistent with the site being FUZ, with urban expansion envisaged in the AUP.
268. Because of the size and nature of the development and the anticipated eventual urbanisation of the area, rather than trying to screen the development or create significant buffers to the adjacent rural areas, the approach has been to accept the change and attempt to develop the site in accordance with a high level of urban amenity. Beneficial effects identified by the assessment include enhancement of the Ngākoroa Stream corridor, extensive planting, the establishment of an accessible coastal esplanade reserve, and public access provided for along the Ngākoroa Stream to the Drury Creek.
269. The report identifies that the viewing audience for the PPC51 area will encompass the following groups:
- Road users on parts of the surrounding road network including Great South Road, Karaka Road, Jesmond Road, McPherson Road, Burt Road, Burberry Road, Pitt Road and Mercer Street
 - Landowners and visitors to the properties accessed off parts of the surrounding road network including Great South Road, Karaka Road, Jesmond Road, McPherson Road, Burt Road, Burberry Road, Pitt Road and Mercer Street
 - Adjoining landowners to the west accessed off Jesmond Road
 - Future residents within Auranga A and Auranga B1 (Drury 1 Precinct) residential development to the north and northwest
 - Recreational users of the Drury Sports Complex and playing fields
 - Recreational users of the Ngākoroa Creek and esplanade reserve (very limited)
 - Viewers within the wider surrounding area.
270. Overall the anticipated level of audience exposure would be relatively large due to the location of the site adjacent to SH22, close proximity to SH1 and height of the development enabled within the BTC zone.
271. While the proposed development will result in a significant visual change from the site's current open semi-rural state to one with urban characteristics, particularly for some of the immediate neighbours (who will experience moderate to high effects), such visual change is anticipated and is in accordance with the key planning initiatives for the area.
272. Despite the relatively low landscape values and limited visual catchment area, the assessment concludes that development will initially generate landscape and visual effects of some significance. These however are inevitable with urban development in a predominantly rural area at the start of a process of urbanisation. In addition, the visual effects of the development of the site apparent from the early stages will decrease over time as proposed vegetation matures.

Peer Review

273. Rebecca Skidmore has reviewed the LVEA (**Appendix 4**). Ms Skidmore agrees with the assessment in relation to natural character effects, and agrees that the fundamental change from a rural to urban landscape is appropriate in this location, given the future urban zoning and the structure plan for the area.
274. In relation to the assessment of landscape effects, the LVEA report notes that while the proposal will result in the loss of rural character, there are a number of positive landscape outcomes associated with the development. This finding relies on a green network breaking up the expansiveness of development. However the streams that require riparian planting are all on the periphery of the precinct, and no other open space is identified. Ms Skidmore considers that the large area of mixed exotic plantings on the eastern side of the lake would make a particular contribution to the amenity and character of a future urban environment, and recommends these are indicated on the precinct plan and retention and integration of at least some of these trees is considered in future subdivision and development applications.
275. Ms Skidmore agrees with the identified viewing audiences for the plan change area. However no analysis or graphic images have been provided demonstrating the suitability of the proposed 27m height limit in relation to the surrounding context. In the absence of this analysis, Ms Skidmore considers a more conservative height limit is appropriate. This is also discussed in relation to urban design effects in section 8.4.
276. In relation to views from SH22 (Karaka Road), Ms Skidmore notes the large numbers of people that will view the plan change area from this corridor and the importance of the relationship of the Precinct to land to the south (and its connection to the future railway station). In her opinion, there is a risk that development will back onto SH22 (particularly given the limitations to vehicle access from the corridor), creating an unsightly appearance from the corridor. She notes there are no specific provisions in the precinct or underlying zone that will secure the extensive street tree plantings and other planting that the LVEA states will integrate the built development into the landscape. Ms Skidmore therefore recommends that an assessment matter and criteria for subdivision and development and new buildings should be added seeking to ensure a positive, high visual quality outcome is achieved at the interface between the Precinct and SH22.

Comments

277. To assist in delivering a green network breaking up the expansiveness of development in the PPC51 area, and an overall higher quality environment, I recommend that the mixed exotic plantings be added to the precinct plan, and assessment criteria included to consider their retention, for example:

New matter of discretion: The retention and integration of existing vegetation

New assessment criterion: Whether existing well-established vegetation, particularly the mixed exotic plantings to the east of the lake feature, is retained and integrated into subdivision and development where possible.

278. Again, I would also recommend Policy IX.3(3) in relation to urban amenity be correspondingly amended to include reference to existing vegetation, although this policy would need to be substantially redrafted without BTC zoning being included in the precinct.

279. There is an approximately 350m long section of SH22 frontage that needs to be considered in terms of visual and amenity effects (south of Burberry Road, the lake and riparian planting should form a visual buffer to development, while Waka Kotahi's NoR D1 proposes a wetland at the northern extent of PPC51's frontage to SH22). As no direct access from sites to SH22 is expected, I agree there is a risk of development here turning its back to the highway.
280. Under the THAB zone and BTC zone (or BLC zone as per my recommendation), some general policies apply in relation to the quality of street interface. I consider that additional policies and/or requirements for the SH22 interface are needed in order to address potential adverse landscape effects. The nature of these requirements is likely to depend on the final zoning pattern.
281. I addressed building heights under the urban design effects section.

8.10. Hazards and Land Contamination Effects

Application

Land stability

282. A preliminary geotechnical investigation has been prepared by Lander Geotechnical for the plan change area, as summarised in section 6.12 of the AEE and attached in full as Attachment 11 to the application.
283. The report identified that there were no obvious signs of large-scale instability or land modification. However, borehole findings indicate that the natural soils can contain pockets of weaker ground and/ or lenses of organics. It is anticipated that a small proportion of lots may be affected by soft ground or organic soils. These can pose constraints to building foundations and residential end use, necessitating remediation during earthworks construction or specifically designed foundation solutions. It is considered that physical site investigations associated with the future subdivision consents will substantiate this risk. The geology within the plan change area should not preclude construction of multi-storey and/or commercial buildings (e.g. within the proposed town centre) in accordance with established building and engineering practice.
284. The report also identified that filling has taken place in two locations within or in proximity to the plan change area. Further investigations will be required to enable the fill layer to be fully quantified during a subsequent investigation phase (resource / subdivision consent). Percolation rate tests have been undertaken across the wider area, but none were located within the plan change area. It is recommended that site-specific Infiltration Testing be required for devices that require Infiltration. In general, the report states that the plan change area is geotechnically stable and suitable for urban development.

Contamination

285. The AEE states that sites within the PPC51 area are largely used for agricultural and pastoral grazing purposes, in addition to lifestyle residential activities. No Preliminary Site Investigation has been undertaken for the site, however, based on previous experience in greenfields development and upon review of historic aerial imagery of the area it is considered highly likely that the site comprises some areas of potential contamination and historical activities from the Hazardous Activities and Industries List. Therefore, a Detailed Site Investigation is required at time of future development.

286. These matters would be subject to resource consent requirements under the NES-CS and Rule E30 of the AUP at time of subdivision, earthworks or development. Areas of contamination can be remediated in accordance with Council requirements.

Flooding

287. The AUP identifies non-statutory 'flood' and overland flowpath overlays in parts of the PPC51 area. With regards to flooding the SMP sets out that the principal aim for the area is to ensure that:

- (a) There is no residential development within the 100 year floodplain;
- (b) There is no building development within riparian margins;
- (c) The existing overland flow paths will be re-diverted and accommodated by re-contouring as part of the development; and
- (d) Overland flow paths up to the 100 year event will be provided within the road carriageways, verges and other defined pathways i.e. in open space reserves.

288. The AEE states that adherence to these measures, in addition to the suite of existing AUP rules (for example E36), will ensure that future resource consents appropriately manage flood risk, and avoid any downstream or upstream flooding effects.

Coastal Inundation and Erosion

289. The AEE states that a coastal hazards assessment was undertaken for the wider area in 2016. For this plan change area, the shoreline adjacent to the estuarine reaches of the Ngākoroa Stream is susceptible to coastal erosion. The estimated bank width that could potentially be affected by coastal erosion and associated slope instability ranges from 3-8m, for bank heights of 3-8m respectively. Accordingly, erosion over the next century and associated slope adjustment will be well contained within a 20m esplanade width (measured from the toe of bank).

290. The assessment noted that it is important that stormwater and runoff from any proposed development is directed away from the coastal margin (e.g. into local streams) as increased water inflows could adversely impact slope stability. Management of vegetation on the coastal margin is also important.

Peer Review

291. The geotechnical hazards assessment has been peer reviewed by James Beaumont, Riley Consultants (**Appendix 4**), who considers that the geotechnical investigations and reporting carried out in support of PPC51 have demonstrated that the majority of the site can accommodate the proposal from a geotechnical perspective, and that there are conventional geotechnical solutions available for building foundation design. However, he is concerned that the geotechnical investigations and report have not addressed the potential for lateral spread of the land in proximity to the stream/estuary and lake. Lateral spread is a significant hazard (e.g. was considered to have a high potential within 100m of the foreshore) that was identified in the Drury-Opāheke Structure Plan work. He considers that the applicant still needs to comment on lateral spread such that Council can be satisfied that the land proposed to be re-zoned is not fundamentally unsuitable or that the hazard could not be mitigated.

292. Subject to suitable resolution of the query, Mr Beaumont considers that from a geotechnical perspective the site is suitable for future development. Further geotechnical input will be required to support future resource and building consent applications to Council. This input will need to include specific geotechnical investigations, analyses and reporting to facilitate detailed building foundation design

and to ensure that all relevant geotechnical issues are appropriately addressed in relation to future specific building proposals.

293. Soil contamination issues have been reviewed by Andrew Kalbarczyk, Senior Specialist – Contaminated Land, Auckland Council (**Appendix 4**). Mr Kalbarczyk states the assessment of the private plan change request should focus on identifying any major constraints associated with contamination that would impede the proposed rezoning, and that other contamination issues can be dealt with at a later stage. While a Preliminary Site Investigation was not provided in support of the plan change, Mr Kalbarczyk has reviewed a Technical Contamination Investigation Report by Riley Consultants for the wider Structure Plan area, prepared in 2018.
294. Mr Kalbarczyk concludes that there appear to be no significant issues of concern with regards to contamination within the subject area. However, a number of potentially contaminating land-use activities and relevant soil contaminants of concern have been identified. Mr Kalbarczyk therefore recommends site-specific Preliminary Site Investigations and Detailed Site Investigations are undertaken prior to residential and commercial development of the land, and remediation is undertaken of affected parcels of land as necessary.

Comments

295. Geotechnical issues were addressed at a high level in the identification of the land as Future Urban and through the development of the Drury-Opāheke Structure Plan. These high level investigations were considered by the Council to be sufficient to assess the land as meeting RPS Policy B2.2.2(2) relating to the identification of future urban land as being suitable for development (namely that areas with significant natural hazard risks are avoided).
296. In this context, the issue raised in the geotechnical review is more to do with what zoning should be applied to the land that has been identified as future urban and whether the relevant Auckland wide and zone-based provisions are adequate to manage subdivision and development.
297. Land instability is identified as a natural hazard under AUP Chapter E36. Policies 32 and 33 of E36 are relevant:
- (32) Require risk assessment prior to subdivision, use and development of land subject to instability.*
- (33) Locate and design subdivision, use and development first to avoid potential adverse effects arising from risks due to land instability hazards, and, if avoidance is not practicably able to be totally achieved, otherwise to remedy or mitigate residual risks and effects to people, property and the environment resulting from those hazards*
298. In my view, there is sufficient information to proceed with rezoning, but I recommend that a reference to a lateral spread risk assessment be added as a Special Information Requirement. For example:
- In relation to the risk assessment required by Policy E36.3.32, complete a high-level (scoping) geotechnical assessment of lateral spread risks prior to the first subdivision that identifies the nature and magnitude for these constraints and implications for development.*
299. I adopt the assessment of Mr Kalbarczyk and consider that no changes to the plan change are required to address land contamination effects. These would be

appropriately addressed at consenting stage through the NES-CS and existing AUP provisions.

300. Flooding and coastal inundation is not widespread in the PPC51 area. I consider that the existing AUP provisions for flooding and coastal inundation, as well as the esplanade reserve required for the Ngākoroa Stream, will sufficiently address these effects.

8.11. Heritage and Archaeological Effects

Application

301. The archaeological and heritage values of the plan change area are discussed in section 6.4 of the AEE. This notes that a Heritage Assessment was prepared by Auckland Council for the Drury-Opāheke Structure Plan. No significant heritage items or archaeological sites have been identified within the plan change area. However there is a concern that there may be potential for the existence of kōiwi in the vicinity. The AUP accidental discovery protocols are proposed to apply to accidental finds.

Peer Review

302. The plan change has been reviewed by Robert Brassey, Principal Specialist Cultural Heritage, Auckland Council (**Appendix 4**).
303. Mr Brassey notes that no archaeological or heritage report or assessment of notable trees was provided with the PPC51 request. The lack of an assessment of notable trees is an information gap that may potentially have implications for historic heritage.
304. While there are no recorded archaeological or heritage sites within the plan change area, Mr Brassey considers there is the potential for unidentified archaeological sites to be present along the margins of the Ngākoroa Stream. Any such sites would be unlikely to meet criteria for inclusion in the AUP heritage schedule, however the intensive planting proposed for the 20m wide esplanade reserve along Ngākoroa Stream could potentially modify or destroy any currently unidentified site. Mr Brassey recommends that an archaeological assessment of the stream margin be required as part of the riparian planting plan standard.
305. In Mr Brassey's view it would be appropriate to rely on the Heritage New Zealand Pouhere Taonga Act 2014, and the AUP Accidental Discovery Rule (E12.6.1) to manage unidentified heritage across the remainder of the plan change area.
306. Mr Brassey also supports a notable tree assessment being undertaken and trees being nominated to the Council to be scheduled where appropriate. With this implemented and the precinct provision amendment identified above, he is able to support the proposed plan change.

Comments

307. I agree that an archaeological assessment of the Ngākoroa Stream margin should occur prior to riparian planting, in order to ensure that RPS Objective B5.2.1(1) and (2) are given effect to in regard to any significant historic heritage place being identified before it may be damaged by planting. I therefore support the archaeological assessment requirement Mr Brassey proposes be included within the riparian planting plan requirement.

308. I consider the requirement for a notable tree assessment is necessary to give effect to RPS Objective B4.5.1 Notable trees. This also links in with the recommendation for a bat assessment requirement in the terrestrial ecology section 8.6 above, as notable trees can include those providing a critical habitat for a threatened species population as per Policy B4.5.2(1)(c).
309. In my view the notable tree assessment is best done at plan change stage because an amendment to AUP Schedule 10 Notable Trees would be required if any notable trees are identified. However in this case, I recommend a notable tree assessment be made a pre-requisite of any subdivision, so that any notable trees can be avoided as a condition of subdivision and development consents, and they can be included in AUP Schedule 10 in due course.

8.12. Reverse Sensitivity Effects

Application

310. Reverse sensitivity effects are discussed in section 6.13 of the AEE. This addresses ongoing consultation in relation to development in the vicinity of the gas transmission line crossing the north-western corner of the plan change site. It also states that in relation to Waka Kotahi's interest in the operation of SH22, no changes are proposed to the existing controls relating to arterial roads in the AUP.

Comments

311. In relation to reverse sensitivity effects on the gas transmission line, I consider sufficient mechanisms are already in place in the AUP to mitigate these. Details of the First Gas submission are addressed in section 10.1.3 of this report.
312. I agree that the controls over access to arterial roads from individual sites in the AUP remain generally appropriate for this plan change area. Due to several proposed new intersections to a State Highway which is to undergo a future upgrade, I have supported a special information requirement to be added for new intersections with SH22 in the transport effects section (8.2) above.
313. Waka Kotahi and Auckland Transport have submitted in relation to noise effects from the operation of arterial roads and SH22 on new sensitive land uses. These submissions are addressed in section 10.1.13 below.

8.13. Positive Effects

Application

314. The AEE states that the form of development illustrated by the Precinct Plan will create an appropriately designed community that provides high quality amenity for residents, housing supply, local employment and access to the future rail network and other high frequency routes.
315. The AEE assesses that the proposed mix of land uses, including town centre zone, and varying intensity residential zones, providing for a range in typologies, will enable a compact urban form to be established at the local community scale. This private plan change, in combination with that in Auranga A and B1 (Drury 1 precinct), provides opportunities to live, work, learn and play within the local area, while also enabling connectivity and access to Manukau, Auckland CBD and also to the central North Island.

Comments

316. The PPC51 site has the potential to provide multiple benefits upon urbanisation. Regardless of the mix of land uses for this area (acknowledging I have recommended a different mix than proposed by the requestor), I consider some amendments should be made to the precinct provisions to promote a high quality environment for future residents, some of whom will be potentially be living in higher density developments where the quality of the built environment and public spaces becomes increasingly important. Specific recommendations have been discussed throughout this section.

9. NOTIFICATION AND SUBMISSIONS

9.1. Notification details

317. Details of the notification timeframes and number of submissions received is outlined below:

Date of public notification for submissions	27 August 2020
Closing date for submissions	22 October 2020
Number of submissions received	44
Date of public notification for further submissions	11 December 2020
Closing date for further submissions	29 January 2021
Number of further submissions received	14

318. One submission [44] was late, and a waiver of time limit was granted to accept the submission on 29 October 2020.

319. One submission [43.1] was withdrawn in part on 11 June 2021.

320. Copies of the submissions are attached as **Appendix 7** to this report.

10. ANALYSIS OF SUBMISSIONS AND FURTHER SUBMISSIONS

321. The following sections address the submissions received on PPC51. It discusses the relief sought in the submissions, and makes recommendations to the Hearing Commissioners.

322. It is noted that for the various recommendations on each submission below, where there is a relevant further submission then this should be determined accordingly.

323. Submissions that address the same issues and seek the same relief have been grouped together in this report under the following topic headings:

- Submissions supporting PPC51 with no amendments
- Submissions on traffic and transport matters
- Submissions on staging, timing and funding issues
- Submissions on infrastructure and servicing
- Submissions on zoning
- Submissions on urban design matters
- Submissions on freshwater and terrestrial ecology
- Submissions on stormwater matters
- Submissions on open space
- Submissions on landscape matters
- Submissions on cultural matters
- Submissions on heritage matters
- Submissions on reverse sensitivity matters
- Submissions on other matters.

324. In the tables below the further submissions have been abbreviated as follows:

- Support = S
- Support in Part = SIP
- Oppose = O
- Oppose in Part = OIP
- Neutral = N

10.1.1. Submissions supporting PPC51 with no amendments

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
1.1	Jennifer Catherine Joyce	Approve the plan change.	
5.1	Rachel and Michael Gilmore	Approve the plan change.	
9.1	Adam Yates	Approve the plan change.	<i>FS12 – SIP</i>
12.1	Karaka & Drury Consultant Ltd	Approve the plan change.	<i>FS12 – SIP</i>
13.1	Barfilon Investment Ltd	Approve the plan change.	<i>FS12 – SIP</i>
14.1	DL & WJ Ltd	Approve the plan change.	<i>FS12 – SIP</i>
15.1	Noah Eastern Limited	Approve the plan change.	<i>FS12 – SIP</i>
16.1	Wendy Jao	Approve the plan change.	
17.1	L & W Rising Ltd	Approve the plan change.	<i>FS12 – SIP</i>
18.1	New Elite Investment Ltd	Approve the plan change.	<i>FS12 – SIP</i>
19.1	Wang wensheng	Approve the plan change.	
20.1	Huawei Development Ltd	Approve the plan change.	<i>FS12 – SIP</i>
21.1	Edison Yi	Approve the plan change.	
22.1	Xibiny Chen	Approve the plan change.	
23.1	Jal Glory investment Ltd	Approve the plan change.	<i>FS12 – SIP</i>
24.1	Jia Liu	Approve the plan change.	
25.1	Bremner Estates Development Limited	Approve the plan change.	<i>FS12 – SIP</i>
26.1	Auranga Resident's Association	Approve the plan change.	<i>FS12 – SIP</i>
27.1	Jonxiang Chen	Approve the plan change.	

28.1	Charles Ma	Approve the plan change as notified if the proposed Town Centre is to be supported by a Drury West train station located as shown in the Drury-Opāheke Structure Plan Area.	<i>FS06 – OIP</i> <i>FS12 – SIP</i>
31.1	Marmitmor Limited	Approve the plan change.	<i>FS12 – SIP</i>

Discussion

325. The reasons for the 21 supportive submissions include a general support for growth in the area, and a view that the plan change meets all the relevant statutory tests and achieves the purpose of the RMA.

326. The support of these submissions is noted. As covered in the above technical reviews and in response to other submissions (as addressed in the following sections), I consider that the plan change request requires modification to give effect to the objectives of the NPS-UD and AUP RPS. I therefore recommend accepting the submissions in part.

Recommendations on submissions

327. That submissions in support (1.1; 5.1; 9.1; 12.1; 13.1; 14.1; 15.1; 16.1; 17.1; 18.1; 19.1; 20.1; 21.1; 22.1; 23.1; 24.1; 25.1; 26.1; 27.1; 28.1; 31.1) be accepted in part, as my recommendation over the following sections is that amendments be made to the plan change before it is approved.

328. There are no amendments associated with this recommendation.

10.1.2. Submissions on traffic and transport matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
2.1	Yu Wang	Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.	<i>FS02 - S</i> <i>FS06 - O</i> <i>FS07 - OIP</i> <i>FS14 - O</i>
34.6	Ministry of Housing and Urban Development	That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with: <ul style="list-style-type: none"> • the current and future urban arterial form and function of State Highway 22 and; • the bulk and location that would support a well-functioning urban arterial. 	<i>FS07 - SIP</i> <i>FS10 - N</i> <i>FS12 - SIP</i> <i>FS13 - O</i>
34.7	Ministry of Housing and Urban Development	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.	<i>FS01 - S</i> <i>FS04 - S</i> <i>FS07 - SIP</i> <i>FS12 - SIP</i> <i>FS13 - O</i>
36.2	New Zealand Transport Agency	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.	<i>FS04 - S</i> <i>FS07 - S</i> <i>FS10 - N</i> <i>FS11 - S</i> <i>FS12 - SIP</i> <i>FS13 - O</i>

36.3	New Zealand Transport Agency	Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).	<i>FS07 - SIP FS10 - N FS11 - S FS12 - SIP FS13 - O</i>
36.4	New Zealand Transport Agency	That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form and function of State Highway 22.	<i>FS07 - S FS10 - N FS11 - S FS12 - SIP FS13 - O</i>
38.2	Counties Power	Retain Policy IX.3(1)(b) to the Precinct provisions.	<i>FS11 - OIP FS12 - SIP</i>
39.7	Auckland Transport	Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to: <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways Public Transport (dedicated lanes, geometry etc) • Ancillary Zone (Parking, Public Transport stops, street trees) • Berm • Frontage • Building Setback • Design Speed. 	<i>FS06 - S FS08 - S with amendments FS10 - N FS11 - S/O FS12 - O FS13 - O</i>
39.8	Auckland Transport	Amend the plan change to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.	<i>FS06 - S FS10 - N FS11 - S/O FS12 - SIP FS13 - O</i>
39.9	Auckland Transport	Amend the plan change to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes.	<i>FS06 - S FS10 - N FS11 - S/O FS12 - SIP FS13 - O</i>
39.10	Auckland Transport	Replace the references to cycle and 3m shared paths with a reference to “separated cycle paths on both sides”. Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions.	<i>FS06 - S FS10 - N FS11 - S/O FS12 - O FS13 - O</i>
39.11	Auckland Transport	a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is capable of accommodating buses.	<i>FS10 - N FS11 - S/O FS12 - OIP FS13 - O</i>

39.12	Auckland Transport	<p>a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road.</p> <p>b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise.</p> <p>c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process.</p>	<p>FS06 - S FS10 - N FS11 - S/O FS12 - OIP FS13 - O</p>
39.13	Auckland Transport	Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.	<p>FS06 - S FS10 - N FS11 - S/O FS12 - O FS13 - O</p>
39.14	Auckland Transport	Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others".	<p>FS10 - N FS11 - S/O FS12 - O FS13 - O</p>
39.15	Auckland Transport	Amend the Precinct Plan and zoning as required to address the issue raised.	<p>FS10 - N FS11 - S/O FS12 - OIP FS13 - O</p>
39.17	Auckland Transport	Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation.	<p>FS06 - S FS10 - N FS11 - S/O FS13 - O</p>
39.18	Auckland Transport	That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.	<p>FS06 - OIP FS10 - N FS11 - S/O FS12 - OIP FS13 - O</p>
40.1	Ministry of Education	<p>Amend Policy IX.3 (2) to the Precinct provision as follows:</p> <p>Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:</p> <p>(a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network, and future rail station <u>and schools</u>;</p> <p>(b) Public open spaces and pedestrian and cycle linkages to public open spaces and schools;</p> <p>...</p>	<p>FS01 - S FS12 - SIP FS13 - SIP</p>
40.4	Ministry of Education	Retain Standard IX.6.4 Site Access.	<p>FS07 - S FS13 - SIP</p>
40.5	Ministry of Education	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.	<p>FS07 - S FS12 - SIP FS13 - SIP</p>
43.3	Kāinga Ora Homes and Communities	Amend Objective 3 to the Precinct provisions as follows:	<p>FS06 - S FS11 - S FS13 - N</p>

		<i>“Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian <u>multi-modal</u> linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities.”</i>	
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Discussion

329. As stated previously, an updated ITA is being prepared, and this response to transport-related submissions is subject to change as a result. Transport-related submission points were made on the following sub-topics:

- Objectives and policies
- Further transport information requirements
- Detail of road cross sections and transport network layout/location.

Objectives and policies

330. Some submitters are seeking amendments to the transport-related precinct objectives and policies. For Objective IX.2(3) of the proposed precinct, the replacement of ‘pedestrian’ with ‘multi-modal’ as sought by Kāinga Ora reflects the need to also cater for freight and public transport movements. I support the amendment sought.

331. I do not see references to schools in Policy IX.3(2) of the proposed precinct, as sought by Ministry of Education [40.1] as fitting within this particular policy. I do however think that Policy IX.3(5) could refer to connections to schools – see further consideration of this policy in section 10.1.3 below. I understand the Ministry is supportive of the walking and cycling routes identified on the precinct plan.

Further transport information requirements

332. I agree with Ministry of Housing and Urban Development [34.7] and Waka Kotahi [36.2] that updates to the technical documents considering the train station location would be useful, as some of the conclusions appear to have been made on the basis of the station being closer. Since submissions closed, KiwiRail has identified its preferred train station location and I have taken this information into account in my assessment. I also agree with Ministry of Housing and Urban Development [34.6], Waka Kotahi [36.4] and Auckland Transport [39.12] that further information on trip generation and traffic modelling would be helpful to clarify what the effects of the plan change are. An updated ITA including traffic modelling is being prepared by the requestor.

Road cross sections and transport network layout/location

333. I disagree with Auckland Transport [39.7, 39.8 and 39.10] that there is a need to specify road / active transport facility design specific to the precinct. The form of future intersections to SH22 should not be specified on the precinct plan, as they are subject to consultation with Waka Kotahi. The cross sections/details of road layouts can be appropriately determined at subdivision stage in accordance with Auckland Transport standards and the classification of the road (which is specified on the precinct plan).

334. In relation to Auckland Transport [39.9] requesting provisions for active mode routes from the PPC51 area to the rail stations and FTN routes, I am recommending that the key roads on the precinct plan are labelled as including active transport facilities, to ensure they are provided at subdivision stage. However I note that these routes also depend on land not within the PPC51 area. I understand that transport modelling assumptions may include a high uptake of public transport. To achieve this,

development of active mode routes to the train station(s) and FTN routes need to be added as a threshold prior to the occupation of any development. I also see the provision of these links as important for the wellbeing of the community.

335. Kāinga Ora and Ministry of Housing and Urban Development state that the precinct provisions predetermine upgrades to existing roads being required, and should not do so. Both the requestor's ITA and the transport peer review find that upgrades are required to support the urbanisation of the PPC51 area. I therefore have no issue with the provisions referring to upgrades of existing roads.
336. The further submission for Yu Wang [2.1 and FS02] has clarified that the original submission point was mis-summarised and that the submitter is not seeking to expand the plan change boundaries. Instead, the alignment of the north-south local road shown cutting through the submitter's site at 20 Burberry Road is sought to be reconsidered (see **Figure 14** below). Auckland Transport [39.18] wants to make sure the alignment is achievable and that any adjustments will not make it more difficult to build the overall integrated, connected network required.



Figure 14: 20 Burberry Road (blue outline) and location of indicative local road (thick blue line)

337. Mr Collins is of the view that there is merit in including the local road within the precinct, to connect between a local road shown on the Drury 1 precinct plan and the proposed centre. The alignment shown on the precinct plan does allow for a level of adjustment through the subdivision process, for example to avoid the house currently on this site. However any alignment of this road will affect the submitter's site.
338. In relation to Auckland Transport [39.11] I have recommended an additional subdivision criterion to consider the enablement of the east-west collector road continuing through neighbouring land to Jesmond Road, through any subdivision application to provide the east-west collector road.

Other

339. Various minor amendments to the precinct plan are recommended in section 8.2, which accord with Auckland Transport submissions 39.13 and 39.14. I agree with Auckland Transport [39.15] that there is no apparent reason for the exclusion of the end of Burberry Road from the precinct boundary and this land should be included in the precinct.
340. Waka Kotahi [36.3] seeks the replacement of references to pedestrians and cyclists with 'active transport' in line with NPS-UD definitions. I am not opposed to this but also note this is not an RMA or National Planning Standards definition.

Recommendations on submissions

341. That submissions 34.6, 34.7, 36.2, 36.4, 39.12, 39.13 be accepted in part, as updated technical information is required and is being prepared by the requestor.
342. That submission 38.2 be accepted in part, as I recommend that Policy IX.3(1) be substantially amended for other reasons.
343. That submissions 39.7 and 39.10 be rejected and the road reserve design detail be left for subdivision stage.
344. That submissions 39.8 and 39.9 be accepted in part and the precinct plan indicate passenger transport provision on any collector road and town centre road to the west, and active transport routes.
345. That submission 39.11 be accepted in part, and a further subdivision criterion is added addressing onwards connection of the east west collector road to Jesmond Road.
346. That submission 39.17 be accepted in part, and a new information requirement be added addressing new road access to SH22.
347. That submission 40.1 be accepted in part and reference to connections to schools and open spaces be added to Policy IX.3(5), rather than Policy IX.3(2).
348. That submissions 40.4 and 40.5 be accepted and these provisions be retained.
349. That submission 43.3 be accepted and Objective IX.2(3) be amended accordingly.
350. That submission 2.1 be rejected, as the indicative road on the submitter's property is supported.
351. That submissions 36.3, 39.13, 39.14, 39.15, 39.18 be accepted and minor amendments be made to the precinct provisions and precinct plan.
352. These amendments are set out in **Appendix 8** to this report.

10.1.3. Submissions on staging, timing and funding issues

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
3.1	Fire and Emergency New Zealand	Add new Policy to the Precinct provisions as follows: • <u>Policy xx: Ensure that development in Drury West is coordinated with supporting stormwater, wastewater and water supply infrastructure.</u>	FS08 – S with amendments FS12 - SIP FS14 - S
11.1	Lomai Properties Limited	Accept the plan change, subject to receiving confirmation that potential traffic effects will be acceptable within the surrounding road network, and that the plan change manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.	FS06 - S FS07 - OIP FS10 - N FS12 - SIP
32.1	Watercare Services Limited	Amend Policy 5 (Infrastructure) to the Precinct provisions as follows: (5) Require subdivision and development to: (a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including <u>water, wastewater and</u> transport upgrades; (b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections; (c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of the <u>existing or planned</u> transport, <u>water or wastewater</u> networks; and (d) Promote and develop connections to the future planned public transport facilities.	FS06 - S FS08 - S with amendments FS11- S/O FS12 - SIP
34.8	Ministry of Housing and Urban Development	Amend IX.2 Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within <u>Standard IX.6.2 necessary to support development within the precinct</u> ;"	FS06 - SIP FS07 - OIP FS10 - N FS12 - SIP FS13 - O
34.9	Ministry of Housing and Urban Development	Amend IX.2 Policy 5(b) to the Precinct provisions as follows: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections ;"	FS06 - SIP FS07 - O FS12 - SIP FS13 - N
35.1	Auckland Council	Decline the plan change in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region.	FS01 - S/O FS07 - S FS08 - N FS11 - S/O FS12 - OIP FS13 - O
35.2	Auckland Council	Ensure that the council's concerns about bulk infrastructure: funding deficit, timing and location	FS07 – S FS10 - N

		<p>uncertainty are resolved by the following or other means:</p> <p>a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.</p> <p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include:</p> <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p>	<p><i>FS11 - S/O</i> <i>FS12 - OIP</i> <i>FS13 - O</i> <i>FS14 - S</i></p>
39.1	Auckland Transport	Decline plan change unless submitter's concerns are addressed including about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed.	<p><i>FS10 - N</i> <i>FS11 - S/O</i> <i>FS12 - OIP</i> <i>FS13 - O</i></p>
36.11	New Zealand Transport Agency	Retain IX.3 Policy 5 to the Precinct provisions.	<p><i>FS07 - S</i> <i>FS08 - S</i> <i>FS10 - N</i> <i>FS11 - S</i> <i>FS12 - SIP</i> <i>FS13 - SIP/OIP</i></p>
37.1	Elly S Pan	<p>That the Plan be amended by:</p> <p>(i) A provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, water, wastewater, stormwater and other methods of transport.</p> <p>(ii) That Burberry Road not be stopped until an alternative route is in place.</p> <p>(iii) That the alternative access to Burberry Road be of a standard not less than that currently exists.</p>	<p><i>FS10 - N</i> <i>FS12 - SIP</i></p>
37.2	Elly S Pan	That any objectives, policies or explanatory passages on which the rules identified above are reliant or based are deleted or amended to the extent necessary in order for Council to appropriately make the amendments sought above.	<p><i>FS10 - N</i> <i>FS12 - SIP</i></p>

38.1	Counties Power Limited	Retain Objective IX.2(4) to the Precinct provisions.	FS11 - OIP FS12 - SIP
38.3	Counties Power Limited	Retain Policy IX.3(5)(a).	FS11 - OIP FS12 - SIP
39.2	Auckland Transport	Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.	FS06 - SIP FS10 - N FS11 - S/O FS12 - OIP FS13 - O
39.4	Auckland Transport	Amend the plan change to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road: <ul style="list-style-type: none"> • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements • Funding and delivery of the above work. 	FS06 - S FS10 - N FS11 - S/O FS12 - OIP FS13 - O
39.5	Auckland Transport	Amend the plan change to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to: <ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new train station; • Any interim improvements to Karaka Road; • Introduction of passenger transport services to the Precinct Plan area • Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. • Any other transport improvements identified as being required to support proposed development. 	FS09 - S FS10 - N FS11 - S/O FS12 - OIP FS13 - O
39.6	Auckland Transport	Amend the plan change to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria.	FS06 - SIP FS10 - N FS11 - S/O FS12 - OIP FS13 - O
40.3	Ministry of Education	Retain Standard IX.6.2 Staging of Development with Transport Upgrades.	FS12 - SIP FS13 - SIP
40.6	Ministry of Education	Confirm ongoing engagement with Auckland Council and Karaka and Drury Ltd with housing typologies, staging and timing for the project.	FS13 - SIP
42.1	Drury South Limited	Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades: (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection. (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.	FS06 - OIP FS07 - SIP FS11 - S FS12 - OIP FS13 - O
43.5	Kāinga Ora Homes and Communities	Amend Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, <u>including</u>	FS06 - SIP FS07 - OIP FS11 - S

		transport upgrades within Standard IX.6.2 necessary to support development within the precinct;"	FS13 - O
43.6	Kāinga Ora Homes and Communities	Retain Policy 5(b) to the Precinct provisions subject to the following amendment: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections; "	FS06 - SIP FS07 - O FS11 - S FS13 - O
43.7	Kāinga Ora Homes and Communities	Retain IX.6.2 (1) Transport infrastructure Requirements provision to the Precinct provisions subject to clarification and/or amendment sought that the phrase "...OR must not precede the upgrades outlined in Table IX.6.2.1" be deleted.	FS06 - SIP FS07 - O FS11 - S FS13 - O

Discussion

353. I do not see any need to refer to co-ordination with water and wastewater infrastructure within the precinct's policies (as requested by Fire and Emergency NZ and Watercare), as these matters are already generally covered under the AUP (RPS Chapter B3 – Infrastructure transport and energy and Chapter E38 – Subdivision). As far as I am aware there are no specific water and wastewater effects unique to this precinct that cannot be managed under the existing AUP framework.

354. The proposed precinct contains Standard IX.6.2 requiring subdivision and development to be undertaken concurrent with or not precede a transport upgrade specifically required for the precinct. I have recommended two further upgrades be added to this standard in section 8.2 above:

<u>SH22 must be upgraded to an urban standard with provision for active transport facilities between Jesmond Road and SH1 Drury Interchange</u>	<u>Prior to the occupation of any new building in the Precinct Plan area.</u>
<u>The intersection of SH22 and Burberry Road must be relocated in general accordance with the Drury 2 precinct plan, and the existing intersection of SH22 and Burberry Road must be closed</u>	<u>Prior to the occupation of any new building in the Precinct Plan area.</u>

Non-compliance with this standard is a Non-Complying Activity under activity table IX.4(A6). These rules are supported by Objective IX.2(4) and Policy IX.3(5). I generally consider this 'provisions cascade' to be appropriate.

355. In my view Policy IX.3(5) could be reworded to better reflect the requirements of the transport staging standard and remove some unnecessary wording, as identified by Ministry of Housing and Urban Development and Kāinga Ora. I support Watercare's suggestion to refer to existing and planned networks in Policy 5(c), as there is a need to manage effects having regard to all of the SGA transport projects yet to be implemented. I would support the following wording:

- (a) *Be sequenced so as to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades necessary to support development within the precinct;*
- (b) *Implement the transport network connections and elements as shown on the Precinct Plan; including by providing new roads and upgrades of existing roads and intersections;*

- (c) Be managed so that it does not adversely affect the safe and efficient operation of the existing and planned transport network; and*
(d) Promote and develop connections to the future planned public transport facilities and social infrastructure such as open space and schools.

356. Ministry of Education [40.3] supports Standard IX.6.2 being retained, while Drury South Limited [42.1] seeks an additional upgrade is added, and Kāinga Ora [43.7] seeks a wording amendment.
357. The additional upgrades I have recommended are added to this standard (see section 8.2) do not include the SH22 / Great South Road intersection, which the new east-west collector road is also proposed to join into. However, I consider the appropriate upgrade of this intersection will be achieved as the south-eastern part of the PPC51 area is developed, through the requirement to be compliant with the precinct plan and consult with Waka Kotahi for any new intersection with SH22. The upgrade of this intersection is also an assessment criterion for Drury South Industrial precinct I410. I do not see a need to include this upgrade in Standard IX.6.2.
358. I agree with Kāinga Ora that Standard IX.6.2 should not be inconsistent with the activity status wording in Activity Table IX.4. I prefer alternative wording where the standard simply refers to complying with the associated table. The table is clear as to which activities trigger which upgrades.
359. Auckland Council and Auckland Transport raise concerns about bulk infrastructure funding deficit, timing and location uncertainty across Drury West and East. As earlier noted, the PPC51 area is within Stage 1 of the FULSS so the proposal is not 'out of sequence'. Although Watercare trunk wastewater infrastructure is not proposed until 2028, there are feasible alternative arrangements proposed. There are a number of transport upgrades identified as required to manage the transport effects of the urbanisation of this area, which I have addressed in sections 2.6 and 8.2 above, and support being required through the precinct provisions (including threshold rules). The Waka Kotahi NoR for the SH22 upgrade now gives increased certainty about the provision and footprint of that upgrade, while the Bremner Road and Jesmond Road FTN NoRs confirm the location of the FTN network. Funding is either in place or expected to be provided for those upgrades so that they are implemented by 2028.
360. I have concluded that from the point of view of a rezoning decision, there is sufficient certainty that the transport infrastructure will be delivered over the medium term. In these circumstances, the use of threshold provisions can appropriately give effect to the RPS requirement to integrate infrastructure planning and land use planning (Objective B3.2.1(5), Policy 3.3.2(5)). There is some benefit in allowing the development processes for the land to commence in the interim, while a live zoning provides flexibility should timing and funding change – or an interim solution be achieved which would adequately serve the PPC51 area's transport requirements.
361. I do not consider any amendment is required to allow for the staging of subdivision and consideration of interim connectivity issues, as sought by Auckland Transport [39.6]. These matters can be considered under AUP Chapter E38 - Subdivision.
362. Auckland Transport is also concerned about the effects of new/relocated intersections with SH22. As set out in section 8.2 I have recommended an additional trigger to require the relocation of Burberry Road intersection and upgrade of Karaka Road / SH22 prior to development of the PPC51 area. I have also recommended a special information requirement be added for any new intersection to SH22. These changes should help to address the submitter's concerns.

363. In response to Elly S Pan's concerns about access for landowners through Burberry Road, no plan provisions are considered necessary to prevent the stopping of Burberry Road until an alternative route is in place. This will be managed through the subdivision and development processes.

Recommendations on submissions

364. That submission 38.1 be accepted and Objective IX.2(4) be retained.
365. That submission 34.9 be accepted and submissions 32.1, 34.8, 36.11, 38.3, 43.5 and 43.6 be accepted in part, and Policy IX.3(5) be amended as per **Appendix 8**.
366. That submission 3.1 be rejected.
367. That submissions 11.1, 35.1, 35.2, 37.1, 37.2, 39.1, 39.2, 39.4, 39.5, 39.6 and 40.6 be accepted in part, to the extent that I am recommending additional transport thresholds and zoning amendments to better integrate land use with infrastructure, and that the plan change be declined if appropriate amendments are not made to address land use and infrastructure integration issues.
368. That submission 40.3 be accepted and submission 43.7 be accepted in part, and Standard IX.6.2 be retained, with amendments.
369. That submission 42.1 be accepted in part, with the intersection of the collector road with SH22 opposite Great South Road being subject to a new special information requirement, but not required to be upgraded before development of the PPC51 area can occur.
370. These amendments are set out in **Appendix 8** to this report.

10.1.4. Submissions on other infrastructure and servicing

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
4.1	God Save The Flag Ltd	Approve the plan change conditional on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside PC area).	FS14 - O
7.1	First Gas Limited	Enable the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status.	FS12 - O FS13 - O
7.2	First Gas Limited	Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location.	FS12 - O FS13 - O
7.3	First Gas Limited	That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated;	FS12 - O FS13 - O
7.4	First Gas Limited	Identify Firstgas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of	FS12 - O FS13 - O

		discretion or assessment criteria include technical advice from Firstgas.	
7.5	First Gas Limited	Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.	<i>FS07 - SIP FS08 - S FS12 - O FS13 - O</i>
7.6	First Gas Limited	Add new Objective to the Precinct provisions as follows: <u>The Drury 2 Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled.</u>	<i>FS12 - O FS13 - O</i>
7.7	First Gas Limited	Add new Policy to the Precinct provisions as follows: <u>The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated'.</u>	<i>FS06 - S FS12 - O FS13 - O</i>
7.8	First Gas Limited	Add new Provision to IX.4-6 Activity Table, Notification and Standards requiring the following; • Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and • Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner.	<i>FS07 - O FS08 - S FS12 - O FS13 - O</i>
10.1	Spark NZ Trading Ltd	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.	<i>FS08 - S with amendments FS12 - SIP</i>
10.2	Spark NZ Trading Ltd	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed.	<i>FS08 - S with amendments FS12 - SIP</i>
10.3	Spark NZ Trading Ltd	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development.	<i>FS08 - S with amendments FS12 - SIP</i>
10.4	Spark NZ Trading Ltd	Consult with Spark and the other telecommunication network providers to ensure funding is available through the infrastructure funding agreements.	<i>FS08 - S with amendments</i>
10.5	Spark NZ Trading Ltd	Include telecommunications infrastructure within the triggers for the staged release of development.	<i>FS12 - OIP</i>
30.1	Soco Homes Limited	Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.	<i>FS06 - SIP FS07 - S FS10 - N FS12 - SIP</i>
35.21	Auckland Council	Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level. The following assessment is sought as well as any consequential amendments to the Precinct plan: 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed;	<i>FS07 - SIP FS11- S/O FS12 - OIP FS13 - O</i>

		2. The impacts of the gas transmission line on the proposed network and associated development patterns; 3. The identification of a local network design that can practically accommodate the gas transmission line; and 4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.	
38.4	Counties Power Limited	Add new policy IX.3.(5)(e) to the Precinct provisions as follows: Require subdivision and development to: ... <u>(e) Enable the reduction of CO2 emissions by promoting the use of renewable energy.</u>	<i>FS11 - OIP</i> <i>FS12 - SIP</i>
38.5	Counties Power Limited	Add new policy IX.3(5)(f) to the Precinct provisions as follows: Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>	<i>FS07 - SIP</i> <i>FS11 - OIP</i> <i>FS12 - SIP</i>
39.16	Auckland Transport	The following assessment is sought along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line. a) Why the approach adopted for the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed. b) The impacts of the gas transmission line on the proposed network and associated development patterns. c) The identification of a local road and reserve network design that can practically accommodate the gas transmission line.	<i>FS10 - Neutral</i> <i>FS11 - S/O</i> <i>FS12 - O</i> <i>FS13 - O</i>

Discussion

371. First Gas [7.1-7.8] seeks various provisions in relation to its high pressure transmission pipeline crossing the PPC51 area (see Figure 2 in section 1.3 of this report for the location of the pipeline). The First Gas pipeline is already protected by way of easements, and is publicly visible on Auckland Council GeoMaps. As a requiring authority, First Gas also has the option of designating the line. The pipeline also passes through the adjacent Drury 1 precinct.
372. Auckland Council and Auckland Transport have also identified that given that buildings are to be avoided on the gas pipeline route, the development pattern should account for this land being road or reserve. The master planning upon which the precinct plan was based (attached to the requestor's Urban Design Assessment) does account for the gas pipeline's location and shows a conceptual layout that accommodates for this.
373. There are AUP objectives and policies in Chapters B3.2, E26.2 and E38.2 that protect infrastructure (including gas transmission pipelines) from reverse sensitivity effects and recognise the value of investment in existing infrastructure, which would need to be considered for the development of the land. I am satisfied that no further mechanism is required in relation to protection of the pipeline route, which must be considered during subdivision in any case. I consider that precinct-specific provisions for the pipeline infrastructure are not appropriate, as these would not add anything to existing AUP provisions. However, I do think adding the pipeline route onto the precinct plan would help to increase its visibility, since it is not shown within the AUP.

374. God Save the Flag Ltd [4.1] seeks access to services to develop 228 Flanagan Road in future. Watercare's further submission opposes this submission as no assessment of capacity and servicing requirements has been carried out for land outside the PPC51 area. I agree with Watercare that the servicing of sites outside the plan change area is not required.
375. Spark has requested ongoing consultation to ensure telecommunications infrastructure is appropriately and adequately provided. If the plan change request is approved and subdivision and development commences, then Spark will need to be approached by the developers. There is no need to amend the proposed Precinct provisions to require this to happen.
376. Spark has also requested that telecommunications infrastructure be included within the triggers for the staged release of development. I see no specific reason to do so.
377. Lomai Properties is in support of the plan change subject to confirming that it manages its infrastructure requirements and will not hinder the remainder of the Drury-Opāheke Structure Plan area from developing. I have recommended changes throughout this report to address these matters.
378. Counties Power [38.5] seeks policy requiring the provision of vehicle recharging areas within parking areas. They state that with electric vehicles becoming more the norm, it is important that enough charging stations are provided for while also allowing for further charging stations without the need for significant upgrade when the demand inevitably increases. I consider that this is an Auckland-wide matter which would be most appropriately addressed through AUP Chapter E27, rather than being an effect specific to this precinct. Counties Power [38.4] also seeks policy promoting the use of renewable energy. Again, I do not see this as a precinct-specific matter.
379. Soco Homes [30.1] owns the property at 54 Jesmond Road, on the other (western) side of Jesmond Road to the PPC51 area. They are concerned that the roading and infrastructure proposed for this plan change will affect a wider area. While I consider connections to adjoining land to be an important consideration, no particular effects on the future development of the submitter's property are identified.

Recommendations on Submissions

380. That submission 7.5 be accepted and submissions 35.21 and 39.16 be accepted in part, and the gas transmission line and easement be shown on the precinct plan.
381. That submissions 7.1-7.3 be accepted in part, to the extent that the gas transmission network is already adequately protected by the AUP, and that submissions 7.4, 7.6, 7.7 and 7.8 be rejected as no provisions are considered necessary in this respect.
382. That submissions 10.1, 10.2, 10.3 and 10.4 be accepted in part to the extent that consultation with Spark will be required, but this is not to be specified within the precinct provisions.
383. That submissions 4.1, 10.5, 30.1 and 38.5 be rejected.
384. These amendments are set out in **Appendix 8** to this report.

10.1.5. Submissions on zoning

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
6.1	Britmat Holdings Ltd	Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.	FS07 - O FS12 - SIP FS13 - O FS14 - O
8.2	The Catholic Diocese of Auckland	Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.	FS03 - OIP FS04 - S FS07 - OIP FS12 - O FS13 - O
8.3	The Catholic Diocese of Auckland	Amend to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'.	FS03 - OIP FS06 -SIP FS07 - OIP FS12 - OIP FS13 - O
28.2	Charles Ma	If the Drury West train station is to be located west of the location shown in the Drury-Opāheke Structure Plan (particularly west of Oira Road), support any amendments to the change that may be sought by the applicant to address that change. This would include (but is not limited to) rezoning all of the plan change area for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones.	FS01 - S FS03 - OIP FS06 - SIP FS07 - OIP FS12 - OIP
34.1	Ministry of Housing and Urban Development	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opāheke Structure Plan.	FS01 - S FS03 - OIP FS04 - S FS07 - OIP FS12 - SIP FS13 - O
34.2	Ministry of Housing and Urban Development	Replace all references to “Town Centre” with ‘Local Centre’. Replace all references to Business – Town Centre Zone with Business – Local Centre Zone.	FS01 - S FS03 - OIP FS04 - S FS07 - OIP FS12 - SIP FS13 - O
35.18	Auckland Council	Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone. Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission. Other supporting technical documents may need to be updated to include this change.	FS01 - S FS06 - OIP FS07 - SIP FS11 – S/O FS12 - SIP FS13 - O
36.1	New Zealand Transport Agency	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury - Opāheke Structure Plan.	FS01 - S FS03 - OIP FS04 - S FS07 - OIP FS10 - N FS11 - S FS12 - OIP FS13 - O

36.5	New Zealand Transport Agency	Replace all references within this precinct description from “Town Centre” to ‘Local Centre’.	FS01 - S FS04 - S FS07 - OIP FS10 - N FS11 - S FS12 - O FS13 - O
36.12	New Zealand Transport Agency	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules.	FS01 - S FS04 - S FS07 - OIP FS10 - N FS11 - S FS12 - OIP FS13 - O
39.3	Auckland Transport	Approve the plan (refers to zoning and land use pattern)	FS01 - O FS10 - N FS11 - S FS12 - SIP FS13 - S
43.1	Kāinga Ora Homes and Communities	Approve the plan change, subject to: <ul style="list-style-type: none"> • The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; • The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and • The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone. [strikethrough part withdrawn on 11 June 2021] 	FS03 - SIP FS04 - O FS05 - O FS06 - OIP FS07 - OIP FS10 - N FS11 - S FS13 - O FS14 - O

Discussion

385. The Catholic Diocese of Auckland [8.2], Ministry of Housing and Urban Development [34.1 and 34.2] and Waka Kotahi [36.1, .5, .12] request the replacement of the proposed BTC zone with a reduced BLC zone. Specific reasons include:

- The Town Centre location does not properly take account of long-term residential development within the wider West Drury area, including all areas within the Future Urban Zone.
- The Town Centre location does not optimise public transport and particularly the rail network and the future West Drury rail station.
- Relevant policy documents place public transport and rapid transit networks at the core of urban form and structure. The town centre scale and intensity is inconsistent with the transit-oriented framework of these documents.
- The scale of centre is over and above what was anticipated in the Drury-Opāheke Structure Plan and insufficient assessment is included to support this scale.
- The assessment of effects provided was made on the basis of an outdated rail station location, and the scale and nature of effects will likely be impacted.

386. I agree with most of these points. In section 8.1 above I have set out my view that the primary Town Centre for Drury West should not be located within the PPC51 area. Instead, I consider a smaller scale of centre that meets the convenience needs of the local residents is more appropriate. However, I disagree with submitters stating that a town centre in Drury West was not anticipated by the Drury-Opāheke Structure Plan. One larger centre and other much smaller centres are depicted. Both Ms Skidmore and Mr Heath consider that the BTC zone is appropriate for the intended role of a primary

centre in the Drury West area, but agree that the centre does not need to be located in PPC51 to fulfil this function.

387. Table 3 below sets out the differences between various AUP centres zones. I consider the Business: Local Centre zone is the most suitable replacement zone, given that it better enables the supermarket required, but limits the retail floor space.

Table 3: Summary of AUP Business: Local Centre, Neighbourhood Centre, Town Centre zones

	Town Centre Zone (proposed)	Local Centre zone	Neighbourhood Centre zone
Applies to	'suburban centres – typically located on main arterial roads, which provide good public transport access'	'small centres – generally located in areas of good public transport'	'single corner stores or small shopping strips'
Building heights provided for	Between four and eight storeys	Four storeys	Three storeys
Types of activities permitted	Dwellings, integrated residential development, visitor accommodation, commercial services, entertainment facilities, cinemas , offices, retail , care centres, community facilities, education facilities, healthcare facilities, recreation facilities, light manufacturing and servicing, warehousing and storage	Dwellings, visitor accommodation, commercial services, food and beverage, offices up to 500m ² GFA, retail up to 450m ² GFA, supermarkets up to 2,000m² GFA, care centres, community facilities, education facilities, healthcare facilities, recreation facilities, light manufacturing and servicing, warehousing and storage	Dwellings, visitor accommodation, commercial services, food and beverage, offices up to 500m ² GFA, retail and supermarkets up to 450m ² GFA, care centres, healthcare facilities

388. The size of the Business: Local Centre zone has not been established. Based on economic analysis provided for demands over the next ten years, it would need to accommodate 7,000-10,000m² GFA (which may be roughly 2-3ha). However, should the occupation of PPC51 need to be delayed until approximately 2031 when the SH22 upgrade is complete, PPC51 will not be able to meet the short term needs of the Drury West catchment. In this case it may be more appropriate to rezone the entire PPC51 area as residential and just rely upon the future town centre (in an alternative location).

389. Following its submission to reduce the town centre scale, the Catholic Diocese [8.3] has sought an amended extent of THAB zone based on the reduced centre, and not compromising an alternative town centre location. I do not have enough detailed analysis available to recommend an alternative zoning pattern. The AUP zoning framework contemplates that some THAB zone is generally appropriate around a Business: Local Centre, so the residential zoning could still include some THAB. The eastern side of the PPC51 area is possibly just within an 800m walk of the proposed metropolitan centre zoning at Drury East, with a future pedestrian upgrade through the interchange/motorway needed. The lake feature provides amenity to support higher density residential development. However the public transport availability factors that also support the application of THAB zone are not as applicable (e.g. the structure plan refers to high density residential within 500m of a FTN route, which does not apply to the PPC51 land). The PPC51 area is not within an 800m walkable catchment of the Drury West or Drury Central train stations.

390. I note that the alternative zoning I am recommending has implications for open space, transport networks and other elements of urban form. It may involve amended road layouts to that shown in the proposed precinct plans. It would also require substantial amendments to the proposed precinct objectives and policies that address the town centre and built form elements (Objectives IX.2(1) and (2), and Policies IX.3 (1), (2), (3) and (4)). These related matters will need to be addressed by the requestor, should my recommendation be accepted.
391. Britmat Holdings Ltd **[6.1]** and Auckland Council **[35.18]** seek extensions to the plan change area to cover additional land. This raises issues of scope and fairness, and no detailed investigations have been provided for this land. The property referred to by Britmat Holdings is not adjoining the PPC51 land. I recommend these submissions be rejected.

Recommendations on submissions

392. That submissions 8.2, 8.3, 34.1 and 36.1 be accepted, and a reduced local centre zone be provided with appropriately supporting THAB zone and MHU zone.
393. That submission 28.2 be accepted in part, as the above recommended zoning changes have not been sought by the requestor at this time.
394. That submissions 34.2, 36.5 and 36.12 be accepted in part, as more substantial wording changes would be required if the town centre was to be replaced with a local centre.
395. That submissions 6.1, 35.18, 39.3 and 43.1 be rejected.
396. These amendments are set out in **Appendix 8** to this report.

10.1.6. Submissions on urban design matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
34.3	Ministry of Housing and Urban Development	Reduce the height variation control from 27m to 19.5m.	<i>FS01 - S FS12 - SIP FS13 - O</i>
34.4	Ministry of Housing and Urban Development	Amend IX.3 Policies 1 & 2 to the Precinct provisions as follows: (1)(b) [second (b)] Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.	<i>FS01 - S FS12 - SIP FS13 - O</i>
34.5	Ministry of Housing and Urban Development	Add new activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m ² gross floor area per tenancy – Discretionary Activity.	<i>FS04 - S FS12 - SIP FS13 - O</i>
35.19	Auckland Council	Add a policy and standard to provide for increased density near RTN stations including: a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended</u>	<i>FS01 - S FS06 - SIP FS07 - SIP FS11 - S/O FS12 - SIP</i>

		walkable radius of a rapid transit network station. b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station. c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone; d. Any alterations to other building standards to respond to increased building height. e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.	<i>FS13 - SIP and OIP</i>
35.20	Auckland Council	Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.	<i>FS11 - S/O FS12 - SIP FS13 - N</i>
36.9	New Zealand Transport Agency	Amend IX.3 Policy 2 to the Precinct provisions as follows: (2)(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.	<i>FS10 - N FS11 - S FS13 - O</i>
36.10	New Zealand Transport Agency	Retain IX.3 Policies 3 & 4 to the Precinct provisions.	<i>FS10 - N FS11 - S FS12 - SIP FS13 - SIP and OIP</i>
36.13	New Zealand Transport Agency	Add a new Activity to Table IX.4.1 to the Precinct provisions as follows: <u>(A8) Retail greater than 450m² gross floor area per tenancy – Discretionary Activity.</u>	<i>FS04 - S FS10 - N FS11 - S FS12 - SIP FS13 - O</i>
43.2	Kāinga Ora Homes and Communities	Approve the plan change, subject to: • the inclusion and application of a 19.5m Height Variation Control in the proposed zoning area; • retaining the spatial extent of the precinct boundaries.	<i>FS03 - OIP FS11 - S FS12 - O FS14 - O</i>
43.4	Kāinga Ora Homes and Communities	Amend Policy 4(h) to the Precinct provisions as follows: "Be designed according to <u>incorporate</u> perimeter block principles where car parking is provided behind buildings except for kerbside parking."	<i>FS11 - S FS13 - N</i>

Discussion

397. Some submitters are concerned about what intensity of retail the precinct may provide for. In section 10.1.5 above I have recommended that the BTC zone and height variation control be removed from the precinct. This would be replaced with a smaller BLC zone and residential zones. Objectives IX.2(1) and (2) and Policies IX.3 (1), (2), (3) and (4) would need to be revised or deleted to reflect this change. No reference to 'intensive' retail would be appropriate. There would be no need for provisions limiting the gross floor area of retail to 450m², as this is the permitted retail GFA for the BLC zone. The key retail frontage and general commercial frontage controls do not apply within the BLC zone, so would be removed and the BLC zone provisions would apply in relation to street frontages.

398. I have not made any recommendations on the detail of the above changes, as they are significant changes that would best be addressed by the requestor.
399. Should the BTC zone be retained, I have recommended the height variation control for that zone be reduced to 21m. Kāinga Ora's [43.2] position on a higher THAB zone height to give effect to the NPS-UD may no longer apply, as the PPC51 area is no longer within a walkable catchment of the train station location and possibly just within a walkable catchment of the proposed metropolitan centre zoning at Drury East, but with further pedestrian facilities required to achieve this.
400. If the town centre is to be within PPC51, it is my view that the standard AUP zone activity rules should apply to retail, and that large format retail should be anticipated when considering traffic, urban design and economic effects. Precinct policies and the frontage controls would address the amenity impacts of retail. At expert conferencing, a method to allow the Key Retail Frontage and General Commercial Frontage Controls to float with the final road locations was proposed to be developed, which I would support.
401. Auckland Council sought a policy on development intensity in relation to the *extended* walkable radius of Rapid Transit Network stations, but did not provide any information on what such a radius would be. Some of the PPC51 land may be in an extended walkable radius of the Drury West and Central train stations. However rather than including a policy, I consider the zoning applied can suitably respond to these factors.

Recommendations on submissions

402. That submissions 34.4, 34.5, 35.20, 36.9 and 36.13 be accepted in part, as neither a town centre nor intensive retail is supported within the PPC51 area.
403. That submission 34.3 be accepted in part, as the recommended height control for the town centre, if retained, is 21m.
404. That submission 35.19 be rejected, and that instead the zoning (and overlays) of the land appropriately responds to the degree of proximity to the future rapid transit network station.
405. That submissions 36.10 and 43.4 be accepted in part, as built form Policies IX.3(3) and (4) would need to be substantially revised / deleted without a town centre in the PPC51 area.
406. That submission 43.2 be rejected.
407. There are no specific amendments associated with these recommendations beyond the recommendations made in section 10.1.5 above.

10.1.7. Submissions on freshwater and terrestrial ecology

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.6	Ngāti Te Ata Waiohua	Apply a minimum of 20-meter riparian margin for all waterways especially those to contain walkways / cycleways.	<i>FS09 - S</i> <i>FS07 - SIP</i> <i>FS11 - S/O</i> <i>FS12 - OIP</i>
35.3	Auckland Council	Include more policies and rules to give full effect to the direction the NPS-FM, including but not limited to Te mana o te wai.	<i>FS11 - S/O</i> <i>FS12 - SIP</i> <i>FS13 - N</i>

35.7	Auckland Council	Amend policy IX.3 (6)(b) to the Precinct provisions as follows: Incorporate <u>biodiversity</u> enhancement planting of riparian margins of streams (including the Ngākoroa Stream) and the lake feature.	<i>FS11 - S/O</i> <i>FS12 – OIP</i> <i>FS13 - N</i>
35.12	Auckland Council	Include indicative permanent and intermittent streams and wetlands on the precinct plan.	<i>FS07 - SIP</i> <i>FS11 - S/O</i> <i>FS12 - OIP</i> <i>FS13 - O</i>
35.14	Auckland Council	Retain and amend IX.6.3 (2) to the Precinct provisions by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.	<i>FS11 – S/O</i> <i>FS12 – SIP</i> <i>FS13 - O</i>
43.8	Kāinga Ora Homes and Communities	Amended the IX.6.3 (2) Riparian Planting provision to the Precinct provisions as follows: “ (2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) Any development or subdivision of land that contains a stream must: (a) include a plan identifying the location, species, planting bag size and density of the plants; [...].”	<i>FS11 - S</i> <i>FS13 - O</i>
44.6	Ngāti Tamaoho	Apply a minimum of 20-meter riparian margin for all waterways especially those to contain walkways / cycleways.	<i>FS07 - SIP</i> <i>FS09 - S</i> <i>FS11 - S/O</i> <i>FS12 - O</i>

Discussion

408. These issues have largely been covered in ecological effects section 8.6 above. I support a 20m building setback from the Ngākoroa Stream to be applied to protect the esplanade reserve from encroachment by buildings, and the riparian planting width to be at least 10m. For the other streams, of which one permanent stream, one intermittent stream and two ephemeral streams are currently indicatively mapped, I consider a 10m planting width would be suitable. I understand that the 30m lakeside yard will apply to the lake feature.
409. I agree that the streams and wetlands should be shown on the precinct plan, noted as being indicative with final alignment and classification to be confirmed at the time of subdivision.
410. In relation to Auckland Council **[35.3]** seeking more provisions to give effect to the NPS-FM, the building material standard I have supported in relation to stormwater quality (see section 8.7) will assist in giving effect to the NPS-FM.
411. I agree with Kāinga Ora **[43.8]** that the wording of standard IX.6.3(2) for riparian planting is unclear. I consider the proposed riparian planting plan to be more appropriately a Special Information Requirement, and suggest it be relocated. I also agree with Auckland Council **[35.14]** that cross reference to AUP planting guidelines would assist in ensuring good outcomes. Appendix 16 - Guideline for native revegetation plantings would be suitable to reference.

Recommendations on submissions

412. That submissions 33.6 and 44.6 be accepted in part, as a 10m minimum riparian planting requirement plus a 20m building setback for the Ngākoroa Stream to ensure space for walkways and cycleways outside of this is recommended.

413. That submission 35.3 be accepted in part, as further provisions have been recommended in relation to freshwater quality through the stormwater assessment.
414. That submissions 35.7 and 35.12 be accepted, as discussed in section 8.6 of this report.
415. That submissions 35.14 and 43.8 be accepted in part, and the riparian margin standard IX.6.3(2) be split into a standard and special information requirement, with a cross reference to AUP Appendix 16 included in the special information requirement.
416. These amendments are set out in **Appendix 8** to this report.

10.1.8. Submissions on stormwater matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.7	Ngāti Te Ata Waiohū	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.	FS11 - S/O FS12 - OIP
33.8	Ngāti Te Ata Waiohū	Require roof capture for reuse and groundwater recharge.	FS11-S/O FS12 - OIP
35.4	Auckland Council	Amend Objective IX.2(5) to read: Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to <u>avoid or otherwise mitigate</u> adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.	FS11 - S/O FS12 - OIP FS13 - N
35.5	Auckland Council	1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngākoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct.	FS07 - SIP FS11 - S/O FS12 - OIP FS13 - N
35.8	Auckland Council	Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.	FS07 - SIP FS11 - S/O FS12 - OIP FS13 - N
35.9	Auckland Council	Add new policies to the Precinct provisions as follows: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u> <u>Require on-site management, or for higher density development private communal management of stormwater runoff from impervious areas.</u> <u>Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</u> Provide hydrology mitigation through retention, near source	FS07 - SIP FS11 - S/O FS12 - OIP FS13 - N

		<p><u>or communal detention to manage effects on streams.</u></p> <p><u>Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.</u></p> <p><u>Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects.</u></p>	
35.10	Auckland Council	Add a new standard to provide for stormwater quality treatment.	<i>FS07 - SIP</i> <i>FS11 - S/O</i> <i>FS12 - OIP</i> <i>FS13 - N</i>
35.11	Auckland Council	<p>Add a new standard to the Precinct provisions as follows:</p> <p><u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u></p>	<i>FS11 - S/O</i> <i>FS12 - OIP</i> <i>FS13 - N</i>
44.7	Ngāti Tamaoho	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.	<i>FS11 - S/O</i> <i>FS12 - OIP</i>
44.8	Ngāti Tamaoho	Require roof capture for reuse and groundwater recharge.	<i>FS11 - S/O</i> <i>FS12 - OIP</i>

Discussion

417. Ngāti Te Ata Waiohua **[33.7 and 33.8]** and Ngāti Tamaoho **[44.7 and 44.8]** are concerned that the PPC51 request does not give effect to Te Mana o Te Wai and risks damaging mauri of wai. Te Mana o Te Wai is given recognition in the NPS-FM. In particular Ngāti Te Ata Waiohua and Ngāti Tamaoho seek:

- A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway
- Roof capture is required for reuse and groundwater recharge.

418. Treatment train approaches and reuse of roof water are also two matters that are addressed in Auckland Council's submission. The submission notes that the plan change should protect the receiving environment of the Te-Manukanuka-O-Hoturoa (Manukau Harbour). Stormwater Management Plans (SMPs) which sit outside the AUP are a key tool to achieve this outcome. SMPs identify effects of stormwater and how effects should be managed both to achieve the RPS, NPS-FM and regional plan and to be in accordance with the region-wide Network Discharge Consent (NDC) granted by the Environment Court on 30 October 2019. Without an SMP approved by the Council (Healthy Waters) there is uncertainty if the SMP adequately manages effects and if there are sufficient provisions to enact the direction that the SMP would provide.

419. I understand that Healthy Waters has reviewed the proposed SMP and provided comments to the requestor, and has also been involved in discussions with the requestor regarding additional precinct provisions that may be required. Mr Sunich is of the view that stormwater quality matters are generally adequately addressed in the SMP document and through the associated authorisation processes of the Auckland Stormwater NDC implemented by Healthy Waters, but recommends a new building material standard be added to the precinct (see section 8.7 above).

420. To support the new standard I recommend a corresponding amendment is made to Policy IX.3(6) in relation to stormwater management, such as:

- (6) Require subdivision and development to:
- (a) Be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation; ~~and~~
- (b) achieve stormwater quality treatment of stormwater runoff through use of inert building materials; and
- ~~(b)~~ (c) Incorporate enhancement planting of riparian margins of streams (including the Ngākoroa Stream) and the lake feature.

421. I also agree that Auckland Council's sought amendment to Objective IX.2(5) is more consistent with the stormwater approach for greenfields areas in Chapter E1, although Mr Sunich does note that development will typically be unable to avoid adverse effects. I recommend it be accepted as follows:

- (5) Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of stormwater on the sensitive receiving environments and enhance the existing stream network and lake feature.

422. I recommend that the SMAF1 control is retained across the entire PPC51 area. Mr Sunich has identified that the hydrological mitigation requirements do not apply to discharges to the tidal environment, which are permitted under SMAF1 rules.

423. In relation to the ongoing discussions between Healthy Waters and the requestor, I understand that more substantial changes are being proposed to the stormwater provisions. I would support further changes where the parties agree these would ensure better integration between the SMP/NDC and the outcomes of consent processes under the AUP.

Recommendations on submissions

424. That submissions 35.9 and 35.11 be accepted in part, and an amendment be made to Policy IX.3(6) and a new standard be added to require use of inert building materials.
425. That submissions 33.7, 33.8, 44.7 and 44.8 be accepted in part, as the SMP in conjunction with an additional building materials standard will deliver adequate stormwater management and quality treatment.
426. That submissions 35.4 and 35.5 be accepted and Objective IX.2(5) be amended, and the SMAF1 control be retained over the entire precinct.
427. That submission 35.10 be rejected and the SMP manage other stormwater quality matters.
428. These amendments are set out in **Appendix 8** to this report.

10.1.9. Submissions on open space

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.9	Ngāti Te Ata Waiohū	Confirm park edge design adjacent to all waterways.	FS08 – S FS11 – S/O FS12 – OIP

35.13	Auckland Council	Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.	FS11 - S/O FS12 – OIP FS13 - O
35.15	Auckland Council	Amend the precinct plan “Future esplanade reserve” to read “ <u>Indicative</u> future esplanade reserve”.	FS11 - S/O FS12 – OIP FS13 – N
35.16	Auckland Council	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.	FS09 - S FS11- S/O FS12 - SIP FS13 - O
40.2	Ministry of Education	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.	FS12 - SIP FS13 - SIP
44.9	Ngāti Tamaoho	Confirm park edge design adjacent to all waterways.	FS11 – S/O FS12 – OIP

Discussion

429. These submissions are largely consistent with my earlier recommendations in the open space effects assessment in section 8.8. Auckland Council seeks a civic space be indicated on the precinct plan as shown on **Figure 15** below. The addition of an indicative open space (its nature depending on zoning) on the precinct plan and a requirement for provision for active transport links within the esplanade reserve should help to address Auckland Council and Ministry of Education concerns that insufficient/inappropriate open space may be provided in the PPC51 area.

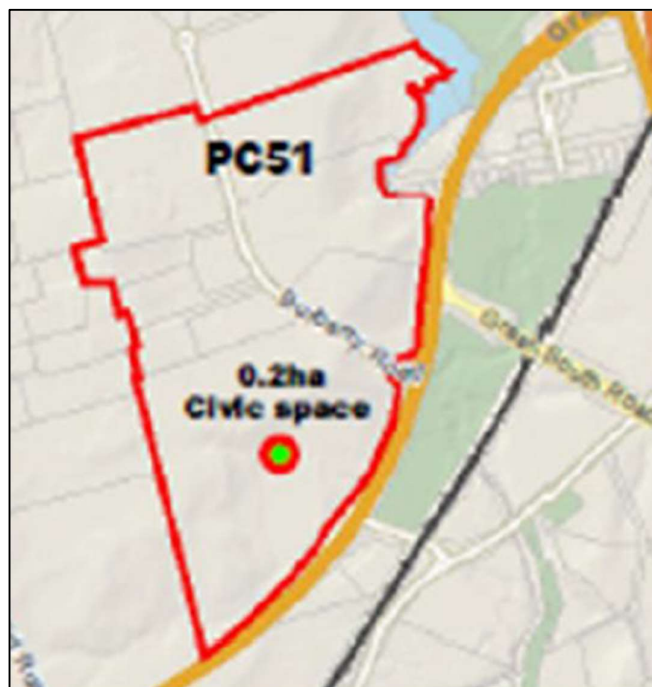


Figure 15: Auckland Council submission showing location of sought indicative open space

430. I agree that the esplanade reserve can be labelled as indicative on the precinct plan, along with the other open spaces.

431. I have recommended that park edge roads are not mandated by the plan change but are considered upon subdivision applications, under the existing subdivision assessment criteria which enable the consideration of these matters.

Recommendations on submissions

432. That submissions 35.13, 35.15, 35.16 and 40.2 be accepted, and the precinct plan be amended to show an indicative open space and indicative esplanade reserve including active transport provision.

433. That submissions 33.9 and 44.9 be accepted in part for the reasons outlined above.

434. There are no specific amendments recommended to provisions. The changes recommended to the precinct plan are set out in **Appendix 8** to this report.

10.1.10. Submissions on landscape matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.5	Ngāti Te Ata Waiohua	Account for natural and cultural landscaping in the project design.	FS11 – S/O
33.10	Ngāti Te Ata Waiohua	Use native trees and plants only within the precinct.	FS08 – S FS11 – S/O FS12 – OIP
33.11	Ngāti Te Ata Waiohua	Protect ridgelines, hilltops and wetlands.	FS11 – S/O FS12 – OIP
44.5	Ngāti Tamaoho	Account for natural and cultural landscaping in the project design.	FS11 – S/O FS12 – OIP
44.10	Ngāti Tamaoho	Use native trees and plants only within the precinct.	FS11 – S/O FS12 – SIP
44.11	Ngāti Tamaoho	Protect ridgelines hilltops and wetlands.	FS11 – S/O FS12 – OIP

Discussion

435. These landscape matters raised by Ngāti Te Ata Waiohua and Ngāti Tamaoho are in relation to their key interests to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.

436. Riparian plantings are likely to be native. I have recommended that riparian planting plans are consistent with AUP Appendix 16 - 'Native revegetation plantings'. In street environments, Ms Skidmore notes that native tree species are not always the most appropriate to thrive and create a suitably vegetated environment. She therefore does not think it is appropriate to require exclusive planting of native species in the Precinct.

437. There is one identified wetland within the precinct. Wetland protection is implemented through the AUP and NES-FM, and no precinct-specific provisions are considered to be required. No ridgelines or hilltops have been identified as requiring protection.

438. Recommendations have been made in section 8.9 above around amending the precinct provisions to mitigate potential landscape effects, including promoting the retention and integration of existing established vegetation.

Recommendations on submissions

439. That submissions 33.5, 33.10, 33.11, 44.5, 44.10 and 44.11 be accepted in part to the extent that sufficient provisions will apply/are recommended that protect wetlands, promote native planting in riparian margins and account for existing natural landscape elements.

440. There are no specific amendments associated with these recommendations.

10.1.11. Submissions on cultural matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
33.1	Ngāti Te Ata Waiohua	Confirm ongoing iwi participation, consultation and engagement in the project.	<i>FS11 – S/O</i> <i>FS12 – SIP</i>
33.2	Ngāti Te Ata Waiohua	Acknowledge within the project design the history of Mana Whenua in the PPC51 area.	<i>FS09 – S</i> <i>FS11 – S/O</i> <i>FS12 – OIP</i>
33.3	Ngāti Te Ata Waiohua	Incorporate Te Aranga Principles in design concepts.	<i>FS09 – S</i> <i>FS11 – S/O</i> <i>FS12 – OIP</i>
33.4	Ngāti Te Ata Waiohua	Confirm iwi monitoring of the project.	<i>FS11 – S/O</i>
35.22	Auckland Council	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.	<i>FS09 – S</i> <i>FS11 – S/O</i> <i>FS13 – O</i> <i>FS12 – OIP</i>
35.24	Auckland Council	Enable and provide for accessible and affordable social housing for Māori.	<i>FS11 – S/O</i> <i>FS12 – O</i> <i>FS13 – O</i>
41.3	HNZPT	Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified.	<i>FS11 – S/O</i> <i>FS12 – SIP</i> <i>FS13 – O</i>
44.1	Ngāti Tamaoho	Confirm ongoing iwi participation, consultation and engagement in the project.	<i>FS11 – S/O</i> <i>FS12 – SIP</i>
44.2	Ngāti Tamaoho	Acknowledge within the project design the history of Mana Whenua in the PPC51 area.	<i>FS09 – S</i> <i>FS11- S/O</i> <i>FS12 – OIP</i>
44.3	Ngāti Tamaoho	Incorporate Te Aranga Principles in design concepts.	<i>FS09 – S</i> <i>FS11- S/O</i> <i>FS12 – OIP</i>
44.4	Ngāti Tamaoho	Confirm iwi monitoring of the project.	<i>FS11 - S/O</i>

Discussion

441. These submissions seek to enable Mana Whenua to provide input into the design and detail of the proposal to ensure that their values are reflected and mitigate adverse cultural effects. The submitters may wish to provide further information at the hearing on the history of Mana Whenua in the PPC51 area.

442. The nature and extent of ongoing involvement of Mana Whenua in the development of the Precinct is a matter for the requestor to address, beyond the involvement typically expected through consent processes.

443. Reflection and incorporation of cultural values into the development will likely involve a number of steps. At a precinct plan level, the recognition and enhancement of streams and their margins is important. In the detailed design of public places (such as streets and open spaces), there are opportunities to incorporate cultural references. Accidental discovery protocols apply to earthworks (with particular provisions relating to riparian margins to be added).
444. Many of the matters raised will be dependent upon the ultimate subdivider and developers building and maintaining relationships with Mana Whenua. The extent of involvement in individual consent applications will continue to be determined by normal AUP/Council consent processing practices. The statutory acknowledgement applying to the majority of the PPC51 area requires specific consideration of Ngāti Tamaoho interests for resource consent applications.
445. Ms Skidmore's urban design review considers that it would be appropriate to reference Mana Whenua values in the precinct description and include policy direction regarding how these can be respected through the application of Te Aranga Design Principles in the design of subdivision and development. The incorporation of these principles will be most importantly integrated in the design of the public realm. A new policy, similar to that proposed in the section 42a reports for PPCs48-50, could be added as follows:

Acknowledge and incorporate Mana Whenua values in development by:

- Retaining and enhancing streams and their margins
- The physical design of streets, open spaces and plazas incorporating Te Aranga Design principles
- Encouraging applicants to seek input of Mana Whenua into the design of key buildings.

446. Auckland Council's request that social housing for Māori be provided for is a matter that lies outside the AUP (as presently constructed).

Recommendations on submissions

447. That submissions 33.1, 33.2, 33.3, 33.4, 35.22, 41.3, 44.1, 44.2, 44.3, and 44.4 be accepted in part, with the addition of a policy in relation to Mana Whenua values, an archaeological survey of riparian margins recommended before planting occurs, and the extent of ongoing involvement by Mana Whenua being determined through the developer and normal AUP/Council consent processing practices.

448. That submission 35.24 be rejected.

449. These amendments are set out in **Appendix 8** to this report.

10.1.12. Submissions on heritage matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
35.23	Auckland Council	Provide a notable tree assessment and scheduling of any notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.	FS09 - S FS08 - S with amendments FS11 - S/O FS13 - O
41.1	Heritage New Zealand	Include provisions within the precinct plan to require archaeological assessment of the area are undertaken by	FS11 - S FS12 - OIP

	Pouhere Taonga	a suitably qualified professional including an evaluation, by a suitably qualified heritage consultant of the wider heritage landscape through the resource consenting process.	FS13 - O
41.2	Heritage New Zealand Pouhere Taonga	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents, as assessed by a professionally qualified archaeologist.	FS11 - S FS12 - OIP FS13 - O
41.4	Heritage New Zealand Pouhere Taonga	Explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four jointly notified plan changes.	FS11 - S FS13 - O

Discussion

450. As outlined in section 8.11 above, I have recommended a notable tree assessment be provided as sought by Auckland Council [35.23], but at the subdivision rather than plan change stage. Taking into account the advice of Mr Brassey, I have recommended an archaeological assessment be prepared before riparian planting within the Ngākorua Stream esplanade reserve, but consider that this is not required for the remainder of the PPC51 area (where the AUP accidental discovery protocols can be relied upon).

451. I do not see the commissioning of a heritage interpretation plan for the wider Drury area to be within the scope of the plan change, however the Local Board may wish to implement this.

Recommendations on submissions

452. That submissions 35.23, 41.1 and 41.2 be accepted in part and submission 41.4 be rejected for the reasons above.

453. These amendments are set out in **Appendix 8** to this report.

10.1.13. Submissions on reverse sensitivity matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
36.6	New Zealand Transport Agency	Add a new Objective to the Precinct provisions as follows: <u>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</u>	FS10 - N FS12 - O FS13 - O
36.8	New Zealand Transport Agency	Insert new Policies to the Precinct provisions as follows; <u>Policy X</u> <u>Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network</u> <u>Policy XX</u> <u>Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls.</u>	FS10 - N FS11 - S FS12 - O FS13 - O
36.16	New Zealand Transport Agency	Insert activity controls as per attachment 1 below	FS10 - N FS11 - S FS12 - O FS13 - O

36.17	New Zealand Transport Agency	Insert matter of discretion and assessment criteria as per attachment 1 below to the submission.	FS10 - N FS11 - S FS12 - O FS13 - O
39.20	Auckland Transport	Add a new Policy to the Precinct provisions as follows: <u>Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.</u>	FS10 - N FS11- S/O FS12 - O FS13 - O
39.21	Auckland Transport	Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: <u>(X) Development that does not comply with IX.6.X Noise Mitigation.</u>	FS06 - SIP FS10 - N FS11 - S/O FS12 - O FS13 - O
39.22	Auckland Transport	Add a new assessment criterion to the Precinct provision as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>	FS10 - N FS11- S/O FS12 - O FS13 - O

Discussion

454. Waka Kotahi seeks to introduce a suite of provisions which address effects on sensitive activities in locations where noise and vibration levels may result in negative health and amenity outcomes. A new standard is sought to apply to any noise sensitive spaces within 100m from the edge of a state highway carriageway. Auckland Transport also seeks a similar set of provisions in relation to arterial roads. Kāinga Ora [FS12] opposes the provisions as resulting in an unnecessary and overly restrictive burden for landowners.
455. I note that the High Land Transport Noise Overlay (40m wide) in the Proposed Auckland Unitary Plan sought to control a similar issue, and was removed in the decisions version due to concerns about costs on a large number of existing property owners. However in this greenfields situation, I consider it is more efficient and cost-effective to construct all new buildings near arterial roads to an adequate level of noise insulation, and protect the health and amenity of occupants.
456. The AUP RPS contains Policy B3.3.2(6) “*Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects.*” Chapter E25 of the AUP (Standard E25.6.10) contains noise level limits as received within noise sensitive spaces in the centres zones. However there are no provisions controlling overall noise received within buildings in residential zones, only limits applying to individual neighbouring activities.
457. I consider the need for a suite of provisions is justified to give effect to Policy B3.3.2(6), but note that the noise limits proposed by Waka Kotahi appear similar to those in E25.6.10. As was recommended in the s42A report for PPCs 48-50, I recommend the application of the E25.6.10 standards to residential activities in this precinct as a more efficient option within the existing structure of the AUP. An additional matter of discretion and assessment criterion focusing on health and amenity of building occupants would then be appropriate, in addition to the matters within Chapter E25.

458. In terms of where the standard should apply, I understand that Waka Kotahi is preparing further analysis in support of its submission. The 100m distance from the State Highway proposed for the application of the standards seems excessive, and I recommend 40m, in lieu of any further information at the time of this report.

459. I support the following wording for the noise mitigation provisions, adapted from the Waka Kotahi and Auckland Transport submissions:

New Policy IX.3(X): Ensure that new activities sensitive to noise adjacent to State Highway 22 are located, designed and constructed to mitigate adverse effects of road noise on occupants.

New Standard IX.6.X: Noise Mitigation. Any new buildings or alterations to existing buildings containing an activity sensitive to noise closer than 40m to the boundary of State Highway 22 must be designed to achieve the noise standards in E25.6.10.

New matter for discretion: Infringements of Standard IX.6.X Noise mitigation: The effects of the non-compliance on the health and amenity of occupants.

New assessment criterion: Infringements of Standard IX.6.X Noise mitigation: Whether alternative mitigation is provided which manages the effects of the non-compliance on the health and amenity of occupants.

460. **Note:** Similar reverse sensitivity issues are being canvassed for the PPC48-50 hearings and as per the acoustic evidence that has recently been filed, the E25.6.10 standards are not considered adequate by all parties. Acoustic advice is likely to be sought for this plan change post publication of this report, and I may seek to amend my recommendations accordingly.

Recommendations on Submissions

461. That submissions 36.6, 36.8, 36.16, 36.17, 39.20, 39.21 and 39.22 be accepted in part, to the extent that provisions are added to address noise effects on residential activities in proximity to arterial roads, partially utilising the standards already contained in Chapter E25.6.10.

462. These amendments are set out in **Appendix 8** to this report.

10.1.14. Submissions on other matters

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions
8.1	The Catholic Diocese of Auckland	In its current form decline the plan change in its entirety.	FS12 - O FS13 - O
28.3	Charles Ma	Does not support any changes being made to the plan change as notified, except where those changes are agreed to and supported by the applicant.	FS12 – OIP
29.1	Andrew Daken	Would like to highlight the below key feedback points along with being able to be involved as the plan change develops. • Should be a Council led plan change for consistency, infrastructural changes including roading loadings as existing infrastructure has only just been improved and will very quickly be outdated. Currently the motorway system is not able to cope with the existing loading.	FS13 - OIP

		<ul style="list-style-type: none"> • Future urban zone change is expected from Council within 2 years, so why push this through now as a Private Change? • PC6 work doesn't appear to have started, so seems odd that another PC is being started • Need to be involved with the PC51 as plan changes will directly impact our property in the future from decisions being made now. • With the increase in the number of new houses and therefore more water usage, water storage tanks should be considered to minimise water supply issues for Auckland as already seen in 2020. 	
33.12	Ngāti Te Ata Waiohua	Reflect sustainable development in the design and outcomes.	<i>FS11 - S/O FS12 - OIP</i>
35.6	Auckland Council	Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read: (1) Activities <u>and subdivision</u> must comply with the Drury X Precinct Plan.	<i>FS11 - S/O FS12 - SIP FS13 - N</i>
35.17	Auckland Council	Ensure that the consent categories in IX.4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.	<i>FS06 - S FS11 - S/O FS12 - SIP FS13 - OIP</i>
36.7	New Zealand Transport Agency	Retain other IX.2 objectives.	<i>FS10 - N FS11 - S FS12 - SIP FS13 - SIP and OIP</i>
39.19	Auckland Transport	Make necessary amendments to the plan change as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.	<i>FS10 - N FS11 - S/O FS12 - OIP FS13 - O</i>
44.12	Ngāti Tamaoho	Reflect sustainable development in the design and outcomes.	<i>FS11 - S/O FS12 - OIP</i>

Discussion

463. These submissions make some more general and holistic comments which can be considered in the context of my recommendations throughout the sections above.
464. I agree with the Catholic Diocese **[8.1]** in not supporting the current form of the plan change.
465. Charles Ma **[28.3]** does not support any changes being made to the notified plan change except where the requestor agrees. The requestor will be responding as to which of my recommendations they support and do not support in evidence.
466. Andrew Daken **[29.1]** has raised some feedback points questioning the need for the private plan change at this time and whether the current infrastructure will cope. The plan change is in accordance with the planned sequence of land release. Provisions have been recommended requiring certain infrastructural upgrades as a pre-requisite of occupation of development.

467. Sustainable development principles have informed my recommendations in this report, to the extent that they are encapsulated in the RMA and AUP. I see an alternative zoning for part of the PPC51 area and alternative location for the town centre as a key contributor to the sustainable development of the Drury West area.
468. I agree with Auckland Council's [35.6] sought change to Standard IX.6.1 to refer to activities and subdivision complying with the Drury 2 precinct plan.
469. Auckland Council [35.17] also wishes to ensure the precinct rules are the most appropriate under the statutory tests. This has been considered in section 11 below.
470. I am familiar with the recommendations made on other Drury private plan changes, in particular PPCs 48-50, and have applied a consistent approach where appropriate as sought by Auckland Transport [39.19].

Recommendations on submissions

471. That submission 8.1 be accepted in part.
472. That submission 28.3 be rejected, as my recommendations do not rely upon the requestor's agreement.
473. That submissions 29.1, 33.12 and 44.12 be accepted in part, as recommendations have been made elsewhere in this report which address these matters.
474. That submission 35.6 be accepted, and Standard IX.6.1 be amended accordingly.
475. That submission 35.17 be accepted in part, as I consider that my recommended amendments to the precinct provisions meet the statutory tests.
476. That submission 36.7 be accepted in part, as some of the precinct objectives are recommended to be retained and some to be substantially revised.
477. That submission 39.19 be accepted in part, as many of my recommendations are consistent with recommendations on the Drury East plan changes.
478. These amendments are set out in **Appendix 8** to this report.

11. OVERALL ASSESSMENT

479. In this section of the report I provide my overall assessment of the proposal against the statutory and policy framework set out in section 7 of this report, taking into account the analysis in sections 8 and 10. Statutory tests that I consider to be key to my assessment are set out in the following sub-headings.

s75(3) Does the plan change give effect to the NPS-UD and RPS?

480. In my view, the proposed BTC zoning does not give effect to Chapter B2 – Urban growth and form of the RPS – specifically, Objectives B2.2.1(1) and B2.3.1(1), Policies B2.2.2(7), B2.3.2(2) and B2.5.2(4). This has been assessed in section 8.1 of this report.

481. RPS Policy 2.5.2(4) states that proposed new town centres should have regard to a number of factors. The proposal gives effect to some of these, including that Drury West's population growth will support a town centre of a size and scale which will avoid effects on other centres (beyond those effects ordinarily associated with trade competition). However, I do not consider B2.5.2(4)(f) "*a safe and efficient transport system which is integrated with the centre*" can be achieved by the location of the town centre in the PPC51 area.
482. The key NPS-UD provision of concern⁸ to me in relation to the BTC zone is Policy 1. I consider that the ability to deliver a well-functioning urban environment for Drury West will be significantly reduced if the town centre is located in the PPC51 area. This is due to likely high dependency upon access by private vehicles by customers and employees, weak integration with public transport and limited ability to enable social wellbeing. In addition there is little support for greenhouse gas emission reductions. With the scale and type of development being sought, I consider that better accessibility and greenhouse gas emission reductions would be needed to give effect to Policy 1.
483. Therefore I have recommended the replacement of the proposed BTC zoning with either a smaller BLC zone and supporting THAB and MHU zones, or just THAB and MHU zones (as noted in Appendix 8). It is my view that this alternative zoning for the PPC51 area can give effect to the RPS, as it will not create or enable the high concentration of trips, employment and activities that a town centre would, that I see as leading to inconsistencies with the urban growth and form direction of the RPS.
484. For the alternative zoning recommended, I still consider some amendments are required to give effect to relevant parts of the AUP RPS, including objectives and policies in:
- B2.7 Open space and recreation facilities
 - B3.2 Infrastructure
 - B3.3 Transport
 - B4.5 Notable trees
 - B5.2 Historic heritage and special character
 - B7.2 Indigenous biodiversity
- as assessed in various sections of this report.
485. Those recommended amendments are included in Appendix 8.

s32(1)(a) Are the objectives the most appropriate way to achieve the purpose of the RMA?

486. I do not consider that Objectives IX.2(1) and (2) (that refer to a Business: Town Centre zoning being provided in the PPC51 area) are the most appropriate way to achieve the purpose of the RMA (as it is translated into the settled objectives and policies of the Auckland Unitary Plan, particularly Chapter B2.2). This is as a result of my assessment that an alternative town centre location nearer the preferred train station location would be more sustainable and better provide for social, economic and cultural wellbeing through being better connected and less reliant on private vehicles.
487. I have recommended some minor adjustments to Objectives IX.2(3) and (5) in Appendix 8. I consider these objectives, as well as Objective IX.2(4), are appropriate, as they identify relevant local matters that will contribute to the sustainable development of the precinct. These are relevant regardless of the urban zoning applied.

⁸ Focusing on those referring to planning decisions, as per case law cited earlier.

S75(1)(b) Do the policies implement the objectives?

488. In my view the proposed precinct policies that refer to a town centre being provided in the PPC51 area (Policies IX.3(1-4)) do not implement the RPS objectives of Chapter B2 and the BTC zone objectives in Chapter H10. These objectives point towards a town centre being well integrated with public transport provision, and being a vibrant and vital commercial and civic hub. While the proposed town centre is able to deliver commercial activities and quality design, its lack of integration with public transport provision reduces its potential to serve the needs of the whole community, and reduces its suitability for the establishment of community and civic activities. I have assessed that Policies IX.3(1-4) would need to be revised to reflect the alternative zoning I have recommended, should this be accepted.
489. Apart from this matter, I consider that the proposed precinct policies do generally implement the proposed precinct and other AUP objectives, however I have recommended some amendments in Appendix 8 where I think improvements could be made.
490. I have recommended a new policy is included relating to Mana Whenua values to promote ongoing iwi participation in the development of the area and the incorporation of cultural values in accordance with objectives in Chapter B6.3 of the RPS. I have also recommended a new policy is included requiring dwellings to be designed to mitigate road noise, which implements RPS objectives B3.2.1(6) and B3.3.1(1) relating to effects from the operation of infrastructure on the health of people.

s32(1)(b) Are the policies, rules and zoning the most appropriate way to achieve the objectives?

491. I have considered the benefits, costs, efficiency, effectiveness, and the risk of acting or not acting in terms of locating the town centre in PPC51 or elsewhere.
492. The key benefit of zoning a town centre within PPC51 is that the land is owned by a ready and willing developer who has already undertaken considerable analysis to inform layout and amenity outcomes for their proposal, and therefore there is some certainty that the town centre will be delivered.
493. Correspondingly, the risk of not zoning a town centre within the PPC51 land is that an alternative suitable proposal for a town centre may not be made. In this respect I note that the Drury West area is in the early stages of its overall development and there is a large amount of Future Urban Zone land remaining, including adjacent to the new train station location south of SH22, where I understand no private plan changes are known to be underway. This land is sequenced for release from 2028, and is in large parcels rather than a range of ownerships. The Council must implement the NPS-UD intensification direction, meaning that the land around the Drury West train station will be zoned for intensive business and/or residential use at some stage unless a qualifying matter applies.⁹ The Council can potentially enable the town centre through a future NPS-UD plan change. I also expect that the train station will provide significant incentive for surrounding development proposals. I note that the land directly around the train station (at 110 Karaka Road) will be severed by the future NoR for access to Drury West train station, with the continued viability of existing productive activities severely affected

⁹ None of the qualifying matters listed in council planning committee minutes 1 July 2021 are known to apply. It is unclear whether the August 2022 timeframe for Council notifying plan changes to implement the NPS-UD would apply to future urban land not programmed for release until 2028.

and new land parcels needing to be created. The risk of the town centre not being provided at all is considered minimal.

494. Whether or not PPC51's proposed town centre would be provided early in the development of the Drury West area, reducing the need for local residents to make trips to Drury East/other established centres at an earlier stage, is uncertain. It is my recommendation upon the current information that development in the PPC51 area is not occupied until after SH22 is upgraded to include four lanes and active transport facilities. This upgrade is not expected to be complete until 2031.
495. The key cost of the town centre locating within PPC51 is the lost opportunity to provide it elsewhere, in a more sustainable long term location that has good integration with the rapid transit network and reduces the need for vehicle movements and car parking. The PPC51 land is not the most effective and efficient location for the Drury West town centre.
496. The proposed town centre would create opportunities for economic growth and employment and the establishment of civic facilities and community services (albeit there may not be much take up of the latter opportunities). These would be significantly reduced if it was to be replaced with a smaller local centre. I assess that an alternative town centre location (while not part of this proposed plan change) would be likely to provide the same economic benefits in a similar timeframe.
497. With regards to the residential zoning proposed, the social and economic benefits resulting from an increased supply of dwellings would remain for the alternative zoning proposal I have suggested, which would include a larger area of residential zoning than currently proposed. The inclusion of a smaller BLC zone would potentially address the risk that the anticipated convenience retail needs of the local market (supermarket and specialty retail) would not be met in the short term – although if occupation of buildings needs to be delayed until 2031 when the SH22 upgrade is expected to be complete, the PPC51 area would be unable to meet any short term market requirements. In this case it may be better to rezone the entire PPC51 area to residential zones.

s76(3) Do the rules have regard to actual or potential effects on the environment?

498. Aside from spatial planning and strategic urban design effects, the identified adverse effects on the environment are likely able to be avoided or mitigated through precinct rules or existing rules in the remainder of the AUP. In Appendix 8 I have recommended various changes to precinct standards, matters of discretion and assessment criteria to address identified effects on the environment. This includes associated matters of discretion and assessment criteria that relate to the rules. In summary, the following changes are recommended, having regard to the effects in brackets:
- Additional triggers in Standard IX.6.2 requiring upgrade of SH22 and relocation of Burberry Road/closure of existing Burberry Road intersection prior to occupation of any new building (transport and social effects)
 - Additional riparian planting requirement for lake feature (ecological effects)
 - Additional standard for building materials to be inert (stormwater quality)
 - Additional noise mitigation standard applying E25.6.10 to noise-sensitive activities development within 40m of SH22 (reverse sensitivity and social effects)
 - Additional yard standard requiring buildings are setback by 20m from the Ngākorua Stream (ecological and open space effects)
 - The addition of matters of discretion and assessment criteria relating to infringements of the new standards above, as well as:

- The retention and integration of existing well-established vegetation (landscape effects)
- Interface of development with the lake feature and SH22 (urban design and landscape effects)
- Connection of the east west collector road through to Jesmond Road (transport connectivity)
- The addition of special information requirements covering:
 - Geotechnical assessment of lateral spread risks (geotechnical effects)
 - Transport assessment and road safety audit for new intersections to SH22 (transport effects)
 - Environmental management plan including ecological surveys of bats and birds, identification of significant ecological values and habitat features, stream surveys, notable trees assessment (ecological and heritage effects)
 - Riparian planting plan including archaeological assessment of riparian margins (ecological and heritage effects).

12. CONCLUSIONS

499. Submissions supporting the plan change cited general reasons, including support for growth in the area, and that the plan change meets statutory tests and achieves the purpose of the RMA. A number of submissions raised concerns about the nature of the centre and residential density proposed, the plan change area's relationship to transport networks, and the funding and staging of the infrastructure.
500. Based on the technical reviews, analysis of submissions and statutory and non-statutory documents, I consider that the plan change request raises a number of conflicts with national policy statements and the regional policy statement in the AUP as set out in relevant RMA planning documents.
501. Upon the current information, the urbanisation of the land is reliant on the upgrade of SH22, which is not anticipated to commence until 2028. The occupation of development would need to be delayed until the upgrade is completed, but the subdivision and development processes for the land could take place in the mean time – while a live urban zoning would enable flexibility if either the timing of the upgrade changes, or a suitable interim solution is achieved.
502. While the urbanisation of the PPC51 land in the short term is consistent with the FULSS, the Business: Town Centre zoning sought does not give effect to Chapter B2 of the RPS and Policy 1 of the NPS-UD, and is inconsistent with the Auckland Plan.
503. The proposed town centre location is not well integrated with future public transport infrastructure provision and does not minimise vehicle movements. It does not maximise the efficiency of the Drury West train station, enable more effective public transport, and respond to the effects of climate change. Its attractiveness to employment activities such as offices is potentially reduced, and it has less chance of maximising employment densities than a centre closer to the train station. It is not the most appropriate location in Drury West to support a vital, vibrant town centre including community and civic activities with access for people of all ages and abilities.
504. I recommend an alternative zoning to that sought, and consider this to be within the scope of submissions. However, an alternative zoning involving a smaller business area and a larger residential area (or solely residential areas) has implications for zone extents, open space, transport networks and other elements of urban form. It may also

involve amended road layouts to that shown in the proposed precinct plans. Further work by the requestor would be required to address these matters.

505. Amendments to the precinct provisions can be made to suitably address other potential adverse effects on the environment, including ecological, landscape, archaeological, stormwater, geotechnical and amenity effects.

506. Provided that amendments are made to the proposed zoning and Precinct provisions to address the issues outlined above (and as more fully detailed in **Appendix 8**), then it is my recommendation that the private plan change request be approved with modifications under clause 29(4)(a) of Schedule 1 of the RMA. However, should the above matters not be resolved in an appropriate manner (that is in a way that does not give effect to national and regional policy), then I would recommend that the plan change request be declined under clause 29(4)(a) of Schedule 1 of the RMA.


13. RECOMMENDATIONS

507. That, the Hearing Commissioners accept or reject submissions (and associated further submissions) as outlined in this report.

508. That, as a result of the assessment of the plan change request and submissions, I recommend that PPC51 be approved with modifications and the Auckland Unitary Plan be amended by inclusion of PPC51, but as modified to address the matters set out in Section 11 and **Appendix 8** of this report.

509. If the matters set out in Section 11 cannot be appropriately resolved, then I would recommend that the plan change request be declined.

14. SIGNATORIES

Name and title of signatories	
Authors	 Emily Buckingham, Consultant Planner
Reviewer / Approver	 Craig Cairncross Team Leader Central South Plans and Places/Chief Planning Office

APPENDIX 4
TECHNICAL PEER REVIEWS



**PC51: Drury 2 Precinct
Proposed Plan Change**

Transportation Hearing
Report

August 2021





flow

TRANSPORTATION SPECIALISTS

115

Project: PC51: Drury 2 Precinct Proposed Plan Change
Title: Transportation Hearing Report
Document Reference: P:\ACXX\407 Auranga B2 Plan Change\Reporting\R1F210804 - PC51 Hearing report.docx
Prepared by: Mat Collins / Terry Church
Reviewed by: Bronwyn Coomer-Smit / Terry Church

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25 Mar 2021	Update with Council comments	R1E210325		
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2 Aug 2021			T Church	

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SUMMARY OF MY PEER REVIEW

Auckland Council (Council) has requested Flow Transportation Specialists Limited (Flow) to review the transportation matters associated with the Drury 2 Precinct Proposed Private Plan Change (PPC51), which has been lodged by Karaka and Drury Limited (KDL) to rezone approximately 33 hectares of Future Urban zoned land to a mix of Business – Town Centre Business and Residential Zones, and to establish the Drury 2 Precinct.

This report has been completed by Mat Collins (Associate) with assistance from Terry Church (Senior Associate).

I note that the Government announced on 4th June 2021 that the funding for the widening of the Southern Motorway (SH1) between Drury Interchange and a new Drury South Interchange (Stage 2) has been deferred¹.

The application documents supporting PPC51 do not include traffic modelling, with Section 7 of the notified Integrated Transport Assessment (ITA) identifying that the ITA will need to be updated once Te Tupu Ngātahi Support Growth release updated traffic modelling for the future land uses within the vicinity of PPC51. As such I am unable to determine how the deferral of Drury South Interchange (which would divert a degree of traffic and thus relieve some pressure from the Drury Interchange) may affect the timing of future development within PPC51.

I agree with the requestor's transport expert that urbanisation and capacity improvements to SH22 are required prior to development within PPC51. However, I understand that the RLTP (2021 – 2031) that was presented to Auckland Council's Planning Committee on 24 June 2021 does not include funding for physical works on SH22 between PPC51 and Drury Interchange. While some funding is included for SH22, I understand this is related to securing a designation for this section of SH22 and not the delivery of physical infrastructure. I also understand that SH22 improvements are focussed to the west of the corridor such as the Glenbrook Road intersection, and not the eastern end of the corridor (fronting the site).

My report reflects the Joint Witness Statement in relation to Transport (dated 2 July 2021). Following expert conferencing, the requestor is preparing an updated ITA to address the differing circumstances since the plan change was lodged, as well as updated planning provisions in response to this and various other submitter concerns. However, this information will not be available in time to fully accommodate into this report. Due to this, my views and recommendations in this report are subject to change.

Forty-four submissions were received, fifteen of which raised transport matters. Key themes from submissions regarding transport matters include

- ◆ Proposed internal transport network structure including road alignment, intersection locations, cross section details, and provision for active transport and public transport users

¹ NZUP factsheet South Auckland, published by Waka Kotahi, available online
<https://www.nzta.govt.nz/assets/planning-and-investment/docs/nzup/nzup-factsheet-south-auckland.pdf>

- ◆ Identification, timing, and responsibility for funding and delivery of enabling/supporting transport infrastructure, including the upgrade of SH22 and location and design of new intersections
- ◆ Assumed location of the Drury West train station, and amendments to land use zoning including the form and function of the proposed Town Centre and extent of urban zoning included in PPC51. These aspects are inter-dependent, and I therefore consider that further work is required from both the requestor and submitters to refine the integration of PPC51 and the Drury West train station
- ◆ Revisions to Precinct provisions.

I generally support submitters comments and requests. However, I do not support (either in full or in part) some submission requests from Soco Homes (Submitter 30) and Auckland Transport (Submitter 39), being

- ◆ Soco Homes submission point 30.1. I consider that further detail on roading layouts within and outside the Precinct is not required at this stage
- ◆ Auckland Transport submission point 39.5 and 39.7. I consider that detailed design of roads is more appropriately determined as part of future resource consent and engineering plan approval applications, noting that these will be subject to Auckland Transport Standards and Guidelines
- ◆ Auckland Transport submission point 39.11. Seeks that the Precinct Plan provides connection outside of the PPC51 boundary, to Jesmond Road and the future Drury West train station. I consider this is outside the scope of PPC51, as future/indicative transport links cannot be shown outside of the Precinct other than within existing legal road corridors.

I consider Council's Reporting Planner should address some submitters' requests from Catholic Diocese of Auckland (Submitter 8), Charles Ma (Submitter 28), Ministry of Housing and Urban Development (Submitter 34), Waka Kotahi NZ Transport Agency (Submitter 36), Auckland Council (Submitter 35) and Kāinga Ora (Submitter 43). Full details of these matters are set out in Appendix A.

Following the period for further submissions, Te Tupu Ngātahi Support Growth announced that the Drury West train station will be located about 450 m south of the intersection of SH22/Karaka Road and Jesmond Road². This is approximately 250m to 700m southwest of the indicative location in Council's Drury Opāheke Structure Plan. The train station and Town Centre proposed for PPC51 are approximately 1,300 m apart via existing and potential future roads, compared with approximately 700m expected as part of the Council's Drury Opāheke Structure Plan.

A walkable catchment for rapid transport stations (such as Drury West train station) is generally regarded to be around 800m³. In my view the degree of integration between the train station and proposed Town Centre will be low as the distance will generally preclude walking trips, in addition

² Te Tupu Ngātahi Support Growth: New train stations for Drury and Paerata February 2021 – available online https://www.supportinggrowth.govt.nz/assets/New-train-stations-for-Drury-and-Paerata/2701fa70db/Project-Info-Sheet_New-train-stations-for-Drury-and-Paerata.pdf

³ Understanding and implementing intensification provisions for the NPS on urban development – available online <https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf>

frequent bus services between the train station and Town Centre are not anticipated by Auckland Transport's future public transport network (as indicated in the Drury Opāheke Structure Plan and recent Notice of Requirements for SH22 and the Jesmond Road to Waihoehoe Road West Frequent Transit Network). From a transport accessibility and connectivity perspective, I consider that the proposed Town Centre would be better located near the intersection of SH22/Karaka Road and Jesmond Road.

I recommend that the Precinct provisions identify the following additional transport infrastructure needed to support the development of PPC51

- ◆ The upgrade and urbanisation of SH22 between Jesmond Road and the Drury Interchange
- ◆ A safe access between SH22 and the Precinct, and closure of the existing Burberry Road/SH22 intersection
- ◆ Urbanisation of Burberry Road along its full length when any road connection is made to Drury 1 Precinct.

Should the Town Centre zoning be adopted, I recommend that

- ◆ The provisions and/or Precinct Plan 1 identify that the "Town Centre Local Road" typology needs to cater for cycling and public transport modes
- ◆ In absence of a high-level feasibility study confirming prior to the hearing that the Collector Roads can be extended to the west, such information should be a matter of discretion and an assessment criteria for any subdivision involving vesting of roads shown on the Precinct Plan.

In regard to the Precinct Plan, I recommend that

- ◆ "by others" is removed from the Precinct Plan legend in reference to the Town Centre Local Road and east/west Collector Road intersections with SH22. I note that this is consistent with Waka Kotahi NZTA's further submission regarding Auckland Transport's submission point 39.12, where it states "The Precinct Plan should not refer to the provision of infrastructure by 'others'"
- ◆ In the absence of further design assessment to confirm intersection form, that the three new intersections with SH22 as shown on the Precinct Plan are not identified as "signalised" in the legend
- ◆ In the absence of further design assessment and approval from Waka Kotahi NZTA regarding the location of the three new intersections on SH22, I recommend that a new Special Information Requirement is included in the Precinct Provisions (similar to I334.9 for the Wairaka Precinct) as follows

IX.9.X Special information requirements

(1) Any new road access to SH22 shall be supported by a Transport Assessment Report and Road Safety Audit, prepared by a suitably qualified transport engineer in consultation with Waka Kotahi NZ Transport Agency, confirming that the location and design of the intersection supports the safe and efficient function of the transport network.

- ◆ I recommend that the alignment of the "Local road with cycle and 3m shared paths" road is altered such that it sits within the Precinct, therefore giving surety that the extent of the connection can be provided

- ◆ I recommend that the Precinct Plan legend is amended to allow the design of the road cross sections to reflect Auckland Transport design standards and guidance at the time of resource consent

“Collector road with ~~cycle and 3m shared paths~~ provision for cycling and walking”

“Local road with ~~cycle and 3m shared paths~~ provision for cycling and walking” and

“Town centre road with provision for public transport, cycling and walking”

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1 INTRODUCTION

Auckland Council (Council) has requested Flow Transportation Specialists Limited (Flow) to review the transportation matters associated with the Drury 2 Precinct Proposed Private Plan Change (PPC51), which has been lodged by Karaka and Drury Limited (KDL) to rezone approximately 33 hectares of Future Urban zoned land to a mix of Business – Town Centre Business and Residential Zones, and to establish the Drury 2 Precinct.

This report has been completed by Mat Collins (Associate) with assistance from Terry Church (Senior Associate). Both Terry and I are experts in the field of transport planning and engineering. We both have a sound knowledge of the Auckland Unitary Plan and the application of the plan to land use developments. Terry and I frequently attend Council Hearing and Environment Court mediation and hearings as transport experts for local government, road controlling authorities or private concerns.

I note that the Government announced on 4th June 2021 that the funding for the widening of the Southern Motorway (SH1) between Drury Interchange and a new Drury South Interchange (Stage 2) has been deferred⁴.

The application documents supporting PPC51 do not include traffic modelling, with Section 7 of the notified Integrated Transport Assessment identifying that the ITA will need to be updated once Te Tupu Ngātahi Support Growth release updated traffic modelling for the future land-uses within the vicinity of PPC51. As such I am unable to determine how the deferral of Drury South Interchange (which would divert a degree of traffic and thus relieve some pressure from the Drury Interchange) may affect the timing of future development within PPC51.

I agree with the requestor's transport expert that urbanisation and capacity improvements to SH22 are required prior to development within PPC51. However, I understand that the RLTP (2021 – 2031) that was presented to Auckland Council's Planning Committee on 24 June 2021 does not include funding for physical works on SH22 between PPC51 and Drury Interchange. While some funding is included for SH22, I understand this is related to securing a designation for this section of SH22 and not the delivery of physical infrastructure. I also understand that SH22 improvements are focussed to the west of the corridor such as the Glenbrook Road intersection, and not the eastern end of the corridor (fronting the site).

My report reflects the Joint Witness Statement in relation to Transport (dated 2 July 2021). Following expert conferencing, the requestor is preparing an updated ITA to address the differing circumstances since the plan change was lodged, as well as updated planning provisions in response to this and various other submitter concerns. However, this information will not be available in time to fully accommodate into this report. Due to this, my views and recommendations in this report are subject to change.

The scope of this specialist transport report is to assist Council in determining the transport outcomes of PPC51 and includes the following

⁴ NZUP factsheet South Auckland, published by Waka Kotahi, available online
<https://www.nzta.govt.nz/assets/planning-and-investment/docs/nzup/nzup-factsheet-south-auckland.pdf>

- ◆ A summary of PPC51 focusing on transport matters
- ◆ A review of the material provided to support the PPC51 application
- ◆ Summary of submissions, relating to transport matters only
- ◆ My recommendations.

I have reviewed the following documents

- ◆ Section 32 Assessment Report as lodged⁵, prepared by Tollemache Consultants Ltd, dated May 2020, including
 - Appendix 1 Locality Map
 - Appendix 3 Precinct Plan and Auranga B2 text
 - Appendix 7 Integrated Transport Assessment (ITA)
- ◆ Clause 23 responses, received from Tollemache Consultants Ltd on 26 June 2020
- ◆ Submissions as outlined in Section 4 and Appendix A
- ◆ Further submissions as outlined in Section 4 and Appendix B.

Subsequent to PPC51 being notified and further submissions being received, Te Tupu Ngātahi Support Growth⁷ provided an update on the preferred location of the Drury West train station. I have considered this information as part of my review, as outlined in Section 3.5.

⁵ I note that no changes to the Section 32 report or Appendix 1, 3, and 7 were made between lodgement and notification

⁷ Te Tupu Ngātahi Support Growth: New train stations for Drury and Paerata February 2021 – available online https://www.supportinggrowth.govt.nz/assets/New-train-stations-for-Drury-and-Paerata/2701fa70db/Project-Info-Sheet_New-train-stations-for-Drury-and-Paerata.pdf

2 THE PPC51 PROPOSAL

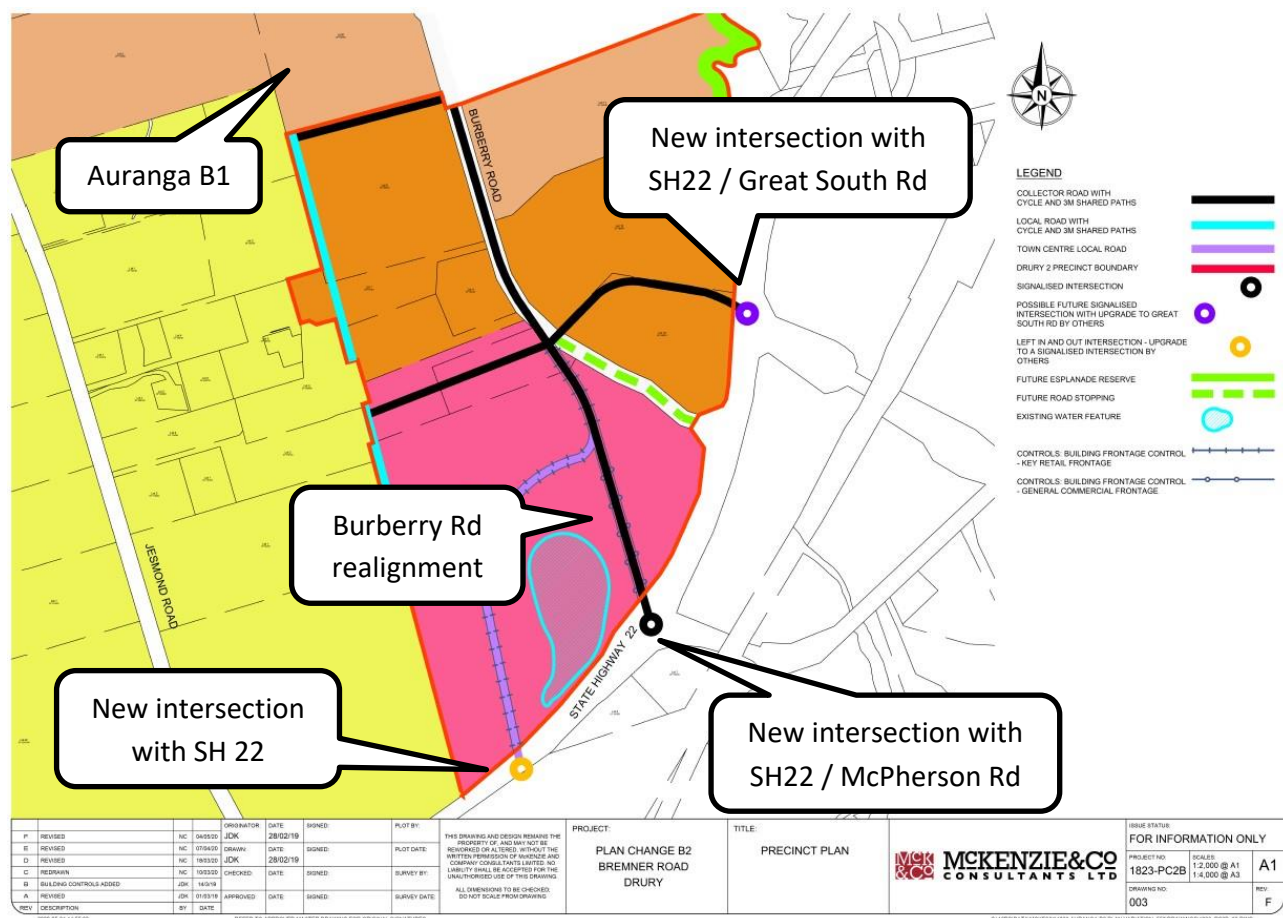
KDL (the requestor) is applying for a private Plan Change to rezone 33.65 hectares of Future Urban zoned land, to a mix of Business -Town Centre, Residential -Mixed Housing Urban and Residential- Terrace Housing and Apartment Building zones.

The PPC51 site area is located to the south of the Drury 1 Precinct, also referred to as Auranga A (rezoned via Plan Variation 15) and Auranga B1 (rezoned via Plan Change 6). The PPC51 area and proposed zoning are shown in Figure 1. The development proposal that is intended to be enabled by PPC51, provides for the establishment of approximately 890 residential dwellings and some 7,000 m² Gross Floor Area (GFA) of business activities which includes a supermarket of approximately 3,500 m² GFA.

PPC51 includes the following road network elements

- ◆ Road stopping of the southern end of Burberry Road (which requires a separate Local Government Act process), and realignment of the southern section to form a signalised intersection with State Highway 22 (SH22) at McPherson Road
- ◆ A new east-west collector road, forming a signalised cross intersection with SH22 and Great South Road, although the AEE states that this connection is not needed to support PPC51
- ◆ Burberry Road connecting with Auranga B1 to the north.

Figure 1: PPC51 Precinct Plan



3 MY REVIEW OF THE APPLICATION MATERIAL

A summary of all the transportation matters raised throughout my review is contained in Appendix B. The following subsections summarise the key transport matters considered during my review, which include

- ◆ the form and timing of transport infrastructure to support the level of development that can be enabled by PPC51
- ◆ enabling walking, cycling and public transport as viable transport options
- ◆ the need for traffic modelling in order to assess the predicted traffic effects and therefore better understand the necessary mitigation required to manage the predicted effects
- ◆ the location of the Drury West train station, and the degree that the proposed Town Centre integrates with this.

3.1 The form and function of supporting transport infrastructure

As part of my Clause 23 information requests, I sought further information on the timing, funding, and responsibility of delivering any transport infrastructure needed to support PPC51 (Flow Clause 23 requests 1, 1B, and 6). The requestor provided responses, dated 26 June 2020, which I summarise as follows

- ◆ The development of roads is a matter to be addressed by Chapters E27 and E38 of the Auckland Unitary Plan (Unitary Plan), and that no further rules are considered necessary
- ◆ Matters such as road closures can be addressed at the design and consenting stage and do not need to be resolved for plan change level of detail
- ◆ Processes for road widening on state highways are a Waka Kotahi NZ Transport Agency matter and to be dealt with by separate Notice of Requirement (NOR) processes
- ◆ No trigger or mechanisms, or limitations on development relating to transport infrastructure are needed.

I consider that these responses have a common theme, that being the provision of enabling infrastructure to support PPC51, and whether this can be addressed as part of future resource consent applications via E27 and E38 of the Unitary Plan, NOR processes and third party delivery. When contemplating this, the following topics are relevant

- ◆ What transport infrastructure improvements are needed to support development of the PPC51 area and when should they be provided?
- ◆ What regionwide provisions of the Unitary Plan are available to Council to ensure these improvements are delivered?

I discuss these topics in the following subsections.

3.1.1 What transport infrastructure improvements are needed to support development?

Section 14 of the ITA states that

“The infrastructure upgrades identified by the ITA in the surrounding area are considered critical to ensuring the transport demands of the PPC can be met”

The local and wider area improvements are identified in Section 5 and Tables 13-1 and 13-2 of the ITA, reproduced below in Figure 2. I support these conclusions of the ITA.

Figure 2: Enabling transport infrastructure, reproduced from the ITA

Table 13-1: Implementation plan

Trigger	Upgrade	Comments	Anticipated cost	Funder
Upgrades from previous Auranga phases: A – PV15 – Drury Precinct Plan 1 and Auranga B1 – PC6 – Precinct Plan 1				
First B1 lot Or First B2 lot	Jesmond / SH22 intersection upgraded to either roundabout or signals	Layout dependant on consultation with NZTA	\$2 million	Developer
Auranga B2 – PPC				
Staged in accordance with B2	Collector Roads	Collector road connections with signalised intersection of realigned Burberry Road, SH22 and McPherson Road	\$unknown	Developer (in stages)

Table 13-2: Other Transport Projects to meet Stage 1 FULSS Growth for Drury West

Infrastructure Project	Comments	Anticipated cost	Funder
SH22 upgrade to four lane urban road with associated signalised intersections and pedestrian / cycling facilities (likely completed in stages)	Supporting Growth currently undertaking a detailed business case	\$75 million	NZTA
SH1 Papakura to Drury South (six lanes plus shared path)	Required for the wider Drury / Pukekohe area	\$423 million	NZTA (construction starts 2021 complete 2025)
Electrification (Papakura to Pukekohe) and construction of rail station in Drury (Drury west)	Required for the wider Drury / Pukekohe area	\$unknown	NZ upgrade programme. Funding committed in January 2020
Pedestrian / cycling links to Rail station	Required for the wider Drury West area	\$unknown	NZ upgrade programme. Funding committed in January 2020
Bus network upgrade linking Auranga B2 to the Drury train stations	Required for the wider Drury West area	\$Unknown	Auckland Transport

Of these improvements, I consider that two key improvements are required to be in place before any development within Auranga B2 occurs, namely

- ◆ The upgrade of SH22 to a 4-lane urbanised arterial road
 - This is to provide additional traffic capacity between PPC51 and the Drury Interchange, and provide for safe transport movements on and across SH22

- In absence of traffic modelling to confirm capacity requirements, my recommendation is that urbanising SH22 is required between the Drury Interchange and the Precinct connections to allow for the safe movement of all transport modes (refer to further discussion in Section 3.3 of this report)
 - The requirement for this to be in place prior to any development in the Precinct is consistent with the requestor's ITA and response to Waka Kotahi NZTA's pre-notification feedback (refer to "PPC Application – Clause 23 Response 26 June 2020" Waka Kotahi Items: Item 2)
 - The requirement is consistent with submitters requests (Ministry of Housing and Urban Development, Waka Kotahi NZTA, and Auckland Transport).
- ◆ The realignment of Burberry Road and provision of a safe access point onto SH22, and closure of the existing Burberry/SH22 intersection
 - This is required to provide safe access to PPC51 before any development occurs, as the existing Burberry/SH22 intersection is considered unsafe for more intensive traffic movements
 - The requirement for this to be in place prior to any development is consistent with Section 2.2.1 of the ITA, and the assessment criteria of the Drury 1 Precinct
 - I consider that progressive urbanisation of the existing section of Burberry Road, north of the realignment, is acceptable as development occurs. However, should a connection be made to Drury 1 Precinct, the full length of Burberry Road should be urbanised consistent with that of the realigned section of Burberry Road to the south. This ensures a safe and connected network is provided for from the outset for all transport modes (in particular for active modes) in the instance that traffic from Drury 1 uses Burberry Road.
 - ◆ While I consider that it would be beneficial for the Drury West train station to be operating as development within PPC51 begins, I do not consider it a pre-requisite due as, in my opinion, there will be limited integration between PPC51 and the train station (as discussed in Section 3.5).

During a meeting between Flow, Council, and the requestor's planners (Renee Fraser-Smith and Mark Tollemache) on 10th July 2020, the requestor's Planners confirmed their agreement that the SH22 and Burberry Road upgrades are required prior to development occurring.

With the requestor's ITA and further feedback being consistent with my recommendations, my consideration now turns to whether the regionwide chapters of the Unitary Plan provide sufficient assurance that these upgrades will be in place before any development occurs within the Precinct. I discuss this below.

3.1.2 Can the provision of transport infrastructure improvements be secured via Chapters E27 and E38?

In the requestor's responses to Flow Clause 23 requests, the requestor stated that the delivery of transport infrastructure and transport services required to support PPC51 is a matter that can be addressed by Chapters E27 and E38 of the Unitary Plan as part of future resource consent applications.

I have set out the likely Chapter E27 and E38 activities, standards and assessment criteria that would apply to future resource consents for PPC51, which are relevant to wider effects on the transport network. These are summarised in Table 1.

Table 1: E27 and E38 standards and matters for discretion that are relevant to wider transport effects

Unitary Plan reference	Aspect	Commentary
E27.6.1	Vehicle Trip Generation	Triggers Restricted Discretionary (RD) status at 100 dwellings. Matters for discretion include effects on the transport network. However, E27.6.1(2) excludes development within Business – Town Centre Zone and Residential – Terrace Housing and Apartment Building Zone. Further, development within the Mixed Housing Urban zone could avoid E27.6.1 if development is progressed with sequential stages, each less than 100 dwellings
E27.6.2	Number of parking and loading spaces	Triggers RD status for infringement on min/max parking rates. Matters for discretion include effects on the transport network. Unlikely to be triggered by development in the Drury 2 Precinct and unlikely to have identifiable effects on SH22. Outcomes associated with the National Policy Statement – Urban Development may alter this criterion also.
E27.6.3, E27.6.4	Parking and access design	Triggers RD status for infringement on parking/access design. Matters for discretion include effects on the transport network. This may be triggered by development in the Drury 2 Precinct but unlikely to have identifiable effects on SH22.
E27.6.4.1	Vehicle Access Restrictions	Triggers RD status for any vehicle access onto SH22. Matters for discretion include effects on the transport network. Unlikely to be triggered by development in the Drury 2 Precinct as no direct vehicle access to SH22 is likely. I note that all development will obtain access from Burberry Road or newly formed internal roads, all of which have local roads.
E29.9(4)	Special information requirements	The Council may require applications which affect the transport network, including proposals which exceed the trip generation threshold, to include transport assessment prepared by suitably qualified transport planner or traffic engineer
Table E38.4.2	Activity table - Subdivision in residential zones	(A14) Subdivision in accordance with an approved land use resource consent complying with Standard E38.8.2.1 is an RD activity. Matters of discretion include the effects arising from any significant increase in traffic volumes on the existing road network, however, in my view, the relevant assessment criteria (Policies E38.3(15) to (17)) point to localised/internalised effects on the transport network rather than wider effects.
		(A18) Vacant sites subdivision involving parent sites of 1ha or greater complying with Standard E38.8.3.1 is a Discretionary activity. This allows consideration of effects on the wider transport network, however it is not uncommon for requestors to argue that vacant sites do not generate transport effects.

In my opinion, reliance on the regionwide provisions of the Unitary Plan to deliver the large scale enabling infrastructure assessed by the requestor's transport engineer as being needed to support any development within PPC51, with transport effects arising from multiple sites, does not provide surety that these upgrades will be delivered through resource consent conditions.

In my experience the regionwide provisions of the Unitary Plan do not adequately provide for an area wide assessment of the cumulative safety and efficiency transport effects that will result from PPC51, should smaller site by site development occur.

I consider that approximately 40% of the PPC51 area could be developed without triggering an assessment of transport effects on the wider transport network, as shown in Figure 3. Development could be delivered such that

- ◆ vacant subdivision of parent sites greater than 1ha are argued to not generate any traffic movements, and therefore there are no traffic effects to assess
- ◆ land use consents in Mixed Housing Urban zoned land are "packaged" for less than 100 dwellings, and therefore not trigger E27.6.1. Further, the threshold of E27.6.1 could be interpreted as the definition of "significant increase in traffic" for E38.12.1(7)(g) for Subdivision in accordance with an approved land use resource consent complying with Standard E38.8.2.1
- ◆ land use consents comply with car parking and loading space rates, and parking and access design standards, and therefore not infringe E27.6.3 / E27.6.4
- ◆ subdivision/development is located north of the proposed realignment of Burberry Rd shown in Precinct Plan 1 (shown indicatively in Figure 3), and therefore is in accordance with the Precinct Plan.

Further, land use consents in Business – Town Centre Zone and or Residential – Terrace Housing and Apartment Building Zone are exempt from Standard E27.6.1. In such a scenario Council will not have an opportunity to ensure the safety and efficiency transport effects on SH22 and Burberry Road are appropriately mitigated, nor that the traffic modelling recommended in Section 7 of the ITA is undertaken.

Figure 3: Potential developable area prior to the realignment of Burberry Road



3.1.3 Summary of transport upgrades required to support PPC51 and how these can be secured

Key transport infrastructure upgrades to support Plan Changes are commonly identified as part of the overlying Precinct. Examples of Precincts that specify enabling infrastructure include Drury 1, Drury South Industrial, Silverdale 3, and Redhills.

This approach allows the cumulative transport effects of development to be appropriately mitigated and managed through the staging of enabling infrastructure. I highlight that the Precinct Provisions proposed by the requestor do include such a mechanism, with Table IX.6.2.1 Transport Infrastructure Requirements identifying the need to upgrade the Jesmond Road/SH22 intersection prior to any subdivision or development within the PPC51 area. While the above trigger is included, I highlight it as

being a mechanism the requestor is familiar with, while noting that the intersection upgrade proposed does not provide access to the Precinct and therefore question its relevance to PPC51.

In my experience the provisions of E27 and E38 cannot be relied upon to address the cumulative area wide effects of PPC51, as development may occur without triggering a requirement to assess effects on the transport network. Should an assessment of effects on the transport network be triggered, I have found that E27 and E38 tend to deal with effects on a site-by-site basis rather than the Plan Change area as a whole.

I consider that the regionwide chapters of the Unitary Plan and the proposed Precinct provisions as they currently stand, do not provide surety that integrated land use/transport outcomes will be achieved. I believe that there is a risk that the cumulative safety and efficiency transport effects on the transport network will not be adequately managed.

In summary, I consider the following

- ◆ In the absence of traffic modelling confirming otherwise, the upgrade and urbanisation of SH22 between Jesmond Road and the Drury Interchange is required before any building is occupied within the Precinct
- ◆ A safe access between SH22 and the Precinct, and closure of the existing Burberry Road/SH22 intersection is required before any development occurs within the PPC51 area. Further, Burberry Road should be urbanised along its full length when any road connection is made to Drury 1 Precinct
- ◆ The regionwide chapters of the Unitary Plan cannot be relied upon to ensure that these improvements are delivered
- ◆ The delivery of these improvements needs to be secured in order to meet AUP RPS Objectives B2.2.1(1), B3.2.1(5) and B3.3.1(1) relating to the integration of urban growth and transport infrastructure.

I recommend that the Precinct provisions identify the following additional transport infrastructure needed to support PPC51

- ◆ ***The upgrade and urbanisation of SH22 between Jesmond Road and the Drury Interchange***
- ◆ ***A safe access between SH22 and the Precinct, and closure of the existing Burberry Road/SH22 intersection***
- ◆ ***Urbanisation of Burberry Road along its full length when any road connection is made to Drury 1 Precinct.***

3.2 Enabling walking and cycling and public transport as viable transport options

The Drury 2 Precinct is likely to generate a high demand for active transport modes, as the area will be

- ◆ fairly densely developed
- ◆ integrated with the Drury 1 Precinct
- ◆ the Drury West train station is within easy cycling distance, though walking trips to and from the station will be limited.

Policy H10.3(15)(b) points to supporting a range of transport modes, and the ability to change transport modes, within Town Centres. However, I am not clear how this will be secured given there are no standards relating to public and active transport modes, nor does the Precinct plan identify a requirement to provide for this within the Town Centre.

While the east/west road structure proposed in the Precinct plan is generally consistent with Council's Drury Opāheke Structure Plan, the application documents supporting PPC51 have not investigated the feasibility of extending these roads to the west to allow them to ultimately connect to Jesmond Road. In relation to the Collector Roads, an understanding of the feasibility of a connection to the west of the Precinct would in my view be appropriate around the connection point to Future Urban Zoned land, but not necessarily the entire length to Jesmond Road.

In my opinion PPC51 fails to deliver integrated land use and transport outcomes in terms of the proposed Town Centre and the Drury West train station, and that this is likely to result in greater reliance on car based transport to and from the Town Centre, at the expense of walking trips. I consider that some objectives and policies of the Auckland Unitary Plan (AUP) Chapter B2 Urban growth and form are not well achieved. When considering transport access and connectivity outcomes, I consider that the proposed Town Centre would be better located near the intersection of SH22/Karaka Road and Jesmond Road. I discuss this matter further in Section 3.5 of this report.

In my opinion, amendments to the Precinct are required to ensure that the Town Centre delivers integrated land use and transport outcomes.

Outcome: Should the Town Centre zoning be adopted, I recommend that

- ◆ ***The provisions and/or Precinct Plan 1 identify that the "Town Centre Local Road" typology needs to cater for cycling and public transport modes***
- ◆ ***In absence of a high-level feasibility studying confirming prior to the hearing that the Collector Roads can be extended to the west, such information should be a matter of discretion and an assessment criteria for any subdivision involving vesting of roads shown on the Precinct Plan.***

3.3 The need for traffic modelling

Sections 6 and 7 of the ITA discuss the trip generation and potential effects on the transport network. The ITA identifies that it will need to be updated once Te Tupu Ngātahi Support Growth release updated traffic modelling for the future land-uses within the vicinity of PPC51. As part of the Joint Witness Statement of experts in relation to Transport and Planning (dated 2 July 2021), all parties agreed that the ITA should be updated to include, amongst other information, traffic modelling to assess the effects of PPC51.

Outcome: My report reflects the Joint Witness Statement in relation to Transport (dated 2 July 2021). Following expert conferencing, the requestor is preparing an updated ITA to address the differing circumstances since the plan change was lodged, as well as updated planning provisions in response to this and various other submitter concerns. However, this information will not be available in time to fully accommodate into this report. Due to this, my views and recommendations in this report are subject to change.

3.4 My recommended changes to the Precinct Plan

3.4.1 New intersections with State Highway 22

The Precinct Plan identifies three new connections/intersections with State Highway 22 being provided, being the new east/west collector road, the realignment of Burberry Road, and the new Town Centre local road as shown in Figure 4 overleaf.

Two of these intersections are identified in the Plan Legend as “by others”. It is not clear why the requestor assumes these intersections are the responsibility of a third party. The requestor’s response to my Clause 23 information request on this matter indicates that the requestor considers road widening is a matter for Waka Kotahi, and presumably the requestor assumes that Waka Kotahi will include the proposed signalised intersections within its planned works for SH22 as part of its Notice of Requirement (NOR).

Waka Kotahi NZTA has lodged a NOR for this section of SH22 and I understand that the intersections proposed by the requestor are not included. Further, I note that a designation protects the land for road widening but does not deliver the actual physical upgrade. The physical works is subject to funding within the RLTP where I understand the funded works associated with SH22 focusses on improvements to the west of the corridor, and not the east (fronting the site).

Further, both Waka Kotahi and Auckland Transport raise concerns in their submissions that there has not been sufficient design investigation to determine the appropriate form and location for the three proposed intersections on SH22. I support their concerns on this matter.

Outcome: I recommend that

- ◆ ***“by others” is removed from the Precinct Plan legend in reference to the Town Centre Local Road and east/west Collector Road intersections with SH22. I note that this is consistent with Waka Kotahi NZTA’s further submission regarding Auckland Transport’s submission point 39.12, where it states “The Precinct Plan should not refer to the provision of infrastructure by ‘others’”***
- ◆ ***In the absence of further design assessment to confirm intersection form, that the three new intersections with SH22 as shown on the Precinct Plan are not identified as “signalised” in the legend***
- ◆ ***In the absence of further design assessment and approval from Waka Kotahi NZTA regarding the location of the three new intersections on SH22, I recommend that a new Special Information Requirement is included in the Precinct Provisions (similar to I334.9 within the Wairaka Precinct) as follows***

IX.9.X Special information requirements

(1) Any new road access to SH22 shall be supported by a Transport Assessment Report and Road Safety Audit, prepared by a suitably qualified transport engineer in consultation with Waka Kotahi NZ Transport Agency, confirming that the location and design of the intersection supports the safe and efficient function of the transport network.

3.4.2 Local road discontinuity

The Precinct Plan shows a “Local road with cycle and 3m shared paths” road typology running approximately north/south along the western boundary of PPC51. This road is interrupted by land parcels outside of the PPC51 area, as shown in Figure 4, which calls into question the feasibility of delivering a connected road network.

Outcome: I recommend that the alignment of the “Local road with cycle and 3m shared paths” road is altered such that it sits within the Precinct, therefore giving surety that the extent of the connection can be provided.

3.4.3 Provision for cycling

The Precinct Plan proposes “Collector road with cycle and 3m shared paths” and “Local road with cycle and 3m shared paths” road typologies. Although Section 5 of the ITA states that final road cross sections will be determined at resource consent stage, the Precinct Plan predetermines this to an extent. In my view the typologies indicated in the Precinct Plan may not align with Auckland Transport’s Roads and Streets Framework and Transport Design Manual.

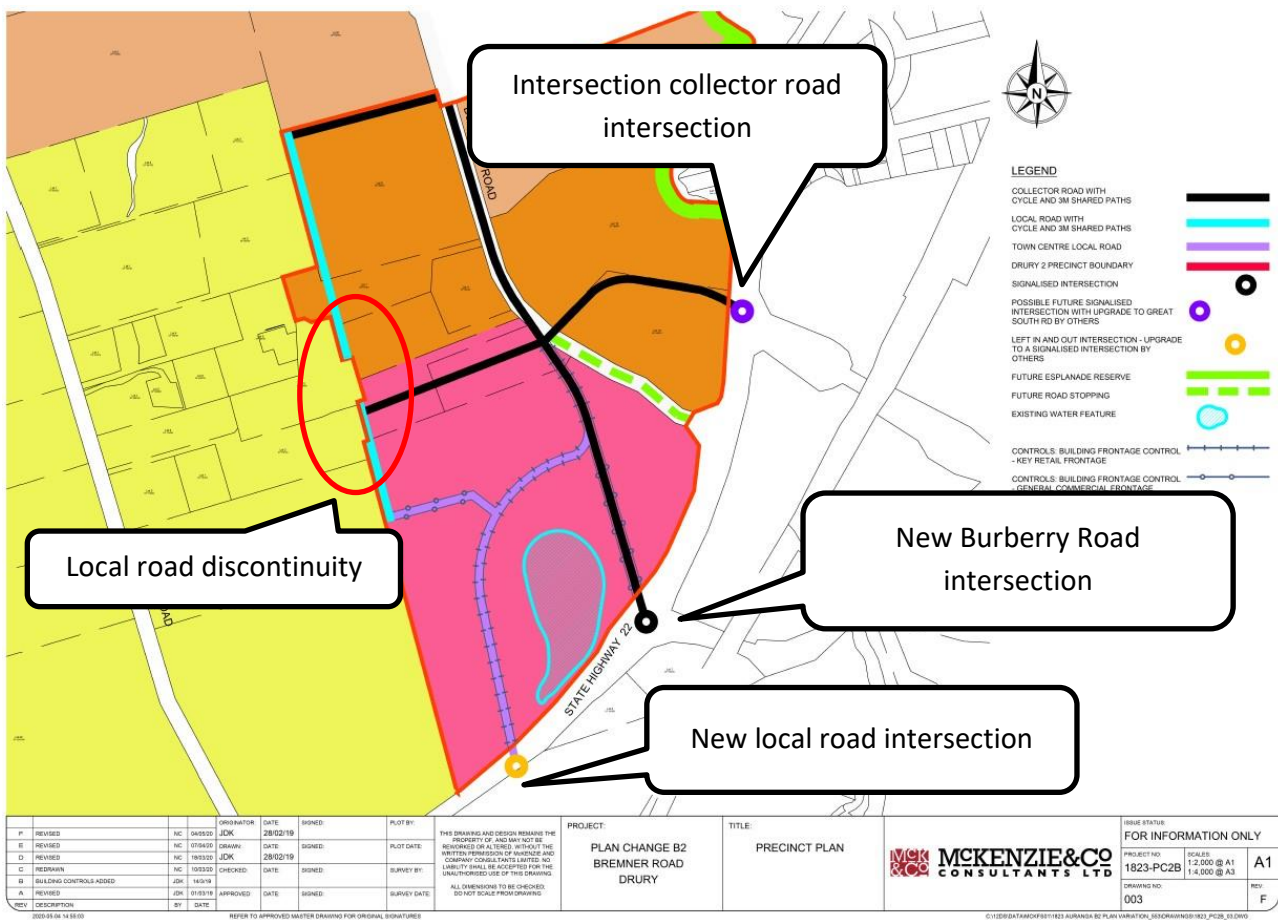
Outcome: I recommend that the Precinct Plan legend is amended to allow the design of the road cross sections to reflect Auckland Transport design standards and guidance at the time of resource consent

“Collector road with ~~cycle and 3m shared paths~~ provision for cycling and walking”

“Local road with ~~cycle and 3m shared paths~~ provision for cycling and walking” and

“Town centre road with provision for public transport, cycling and walking”

Figure 4: Aspects of the Precinct Plan discussed in Section 3.4 of this report



3.5 My review of the integration between the Town Centre and the Drury West train station

Following the period for further submissions on PPC51, Te Tupu Ngātahi Support Growth announced that the Drury West train station will be located about 450 m south of the intersection of SH22/Karaka Road and Jesmond Road⁸, as shown in Figure 5. This is approximately 250 m to 700 m southwest of the indicative location in Council’s Drury Opāheke Structure Plan (as shown in Figure 6). The train station and Town Centre proposed for PPC51 are approximately 1,300 m apart via existing and potential future roads, compared with approximately 700 m expected as part of the Council’s Drury Opāheke Structure Plan, as shown in Figure 7.

⁸ Te Tupu Ngātahi Support Growth: New train stations for Drury and Paerata February 2021 – available online https://www.supportinggrowth.govt.nz/assets/New-train-stations-for-Drury-and-Paerata/2701fa70db/Project-Info-Sheet_New-train-stations-for-Drury-and-Paerata.pdf

Figure 5: Te Tupu Ngātahi Support Growth preferred location for Drury West train station



Figure 6: Indicative location for Drury West train station in Council's Drury Opāheke Structure Plan

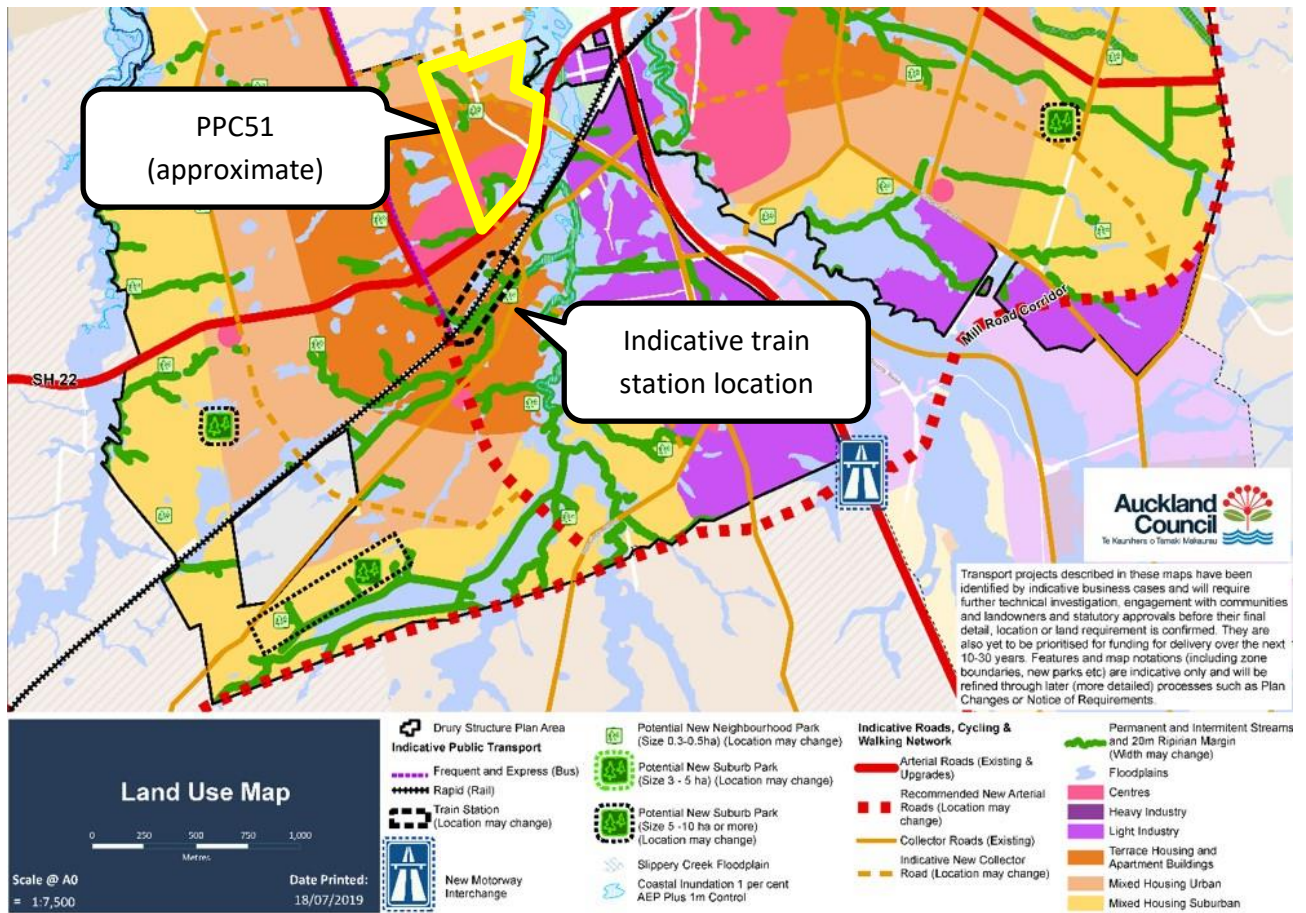
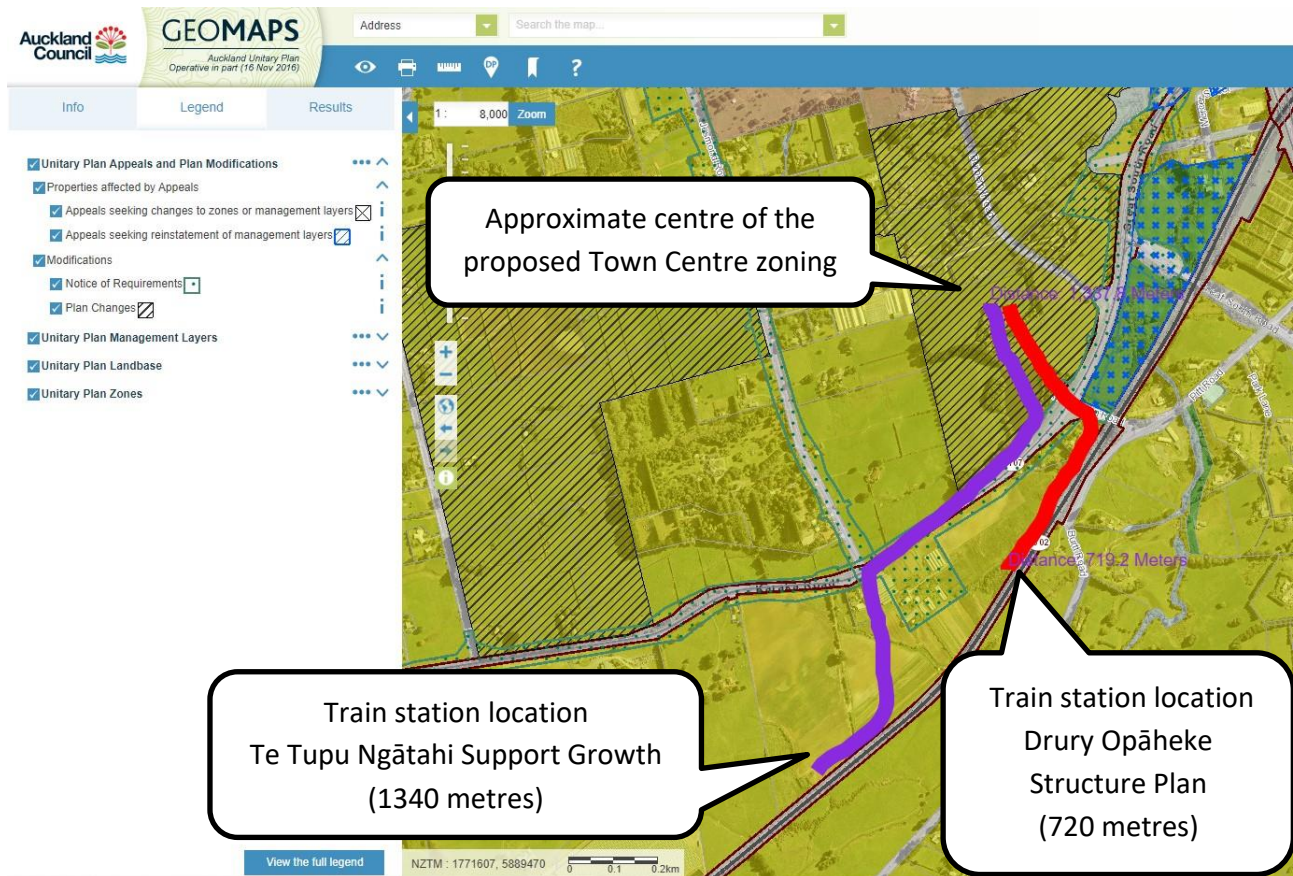


Figure 7: Proximity of the proposed Town Centre to the Drury West train station



I have considered the integration of the Town Centre and the Drury West train station in the context of relevant objectives and policies within the Regional Policy Statements (RPS) in the AUP, the National Policy Statement on Urban Development, and other relevant guidance on the integration of land use with rapid transit stations, with key aspects identified in Table 2.

Table 2: Objectives, policies and guidance relevant to the integration of the train station with PPC51 Town Centre

Relevant policy / guidance
<p>AUP B2.2.1(1) a quality compact urban form that enables</p> <ul style="list-style-type: none"> ◆ better use of existing infrastructure and efficient provision of new infrastructure; ◆ improved and more effective public transport; ◆ reduced adverse environmental effect
<p>AUP B2.3.1(d) A quality built environment where subdivision, use and development do all of the following... a quality built environment is to maximise resource and infrastructure efficiency</p>
<p>AUP B2.3.2(2)(b) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following... enabling walking, cycling and public transport and minimising vehicle movement</p>
<p>AUP B2.5.2(4) Enable new metropolitan, town and local centres following a structure planning process and plan change process in accordance with Appendix 1 Structure plan guidelines, having regard to all of the following enable new town centres... a safe and efficient transport system which is integrated with the centre.</p>
<p>AUP B3.3.1 (1) Effective, efficient and safe transport that</p>

<ul style="list-style-type: none"> ◆ supports the movement of people, goods and services; ◆ integrates with and supports a quality compact urban form; ◆ facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community
<p>NPS-UD Objective 1</p> <p>New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future</p>
<p>NPS-UD Objective 3</p> <p>Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <ul style="list-style-type: none"> ◆ the area is in or near a centre zone or other area with many employment opportunities ◆ the area is well-served by existing or planned public transport ◆ there is high demand for housing or for business land in the area, relative to other areas within the urban environment.
<p>NPS-UD Objective 6</p> <p>Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> ◆ integrated with infrastructure planning and funding decisions; and ◆ strategic over the medium term and long term; and ◆ responsive, particularly in relation to proposals that would supply significant development capacity
<p>Understanding and implementing intensification provisions for the NPS-UD¹⁰</p> <p>This document indicates an 800m walking distance (not radius) as a practical distance for evaluating accessibility for intensification purposes.</p> <p>It identifies a walkable catchment of 400 metres as being typically associated with a five-minute average walk and 800 metres with a 10-minute average walk.</p> <p>It directs Council's to <i>"ensure transport planning for public transport and active modes is done in an integrated and iterative way alongside land-use Planning"</i>.</p>

I consider that the distance between the Town Centre and the train station means it is unlikely to result in integrated land use and transport outcomes. The distance will preclude the majority of walking trips between the two locations, that would otherwise occur if they were in closer proximity. Bus connections between the proposed Town Centre and train station are unlikely to be sufficient to enable integration either, as the proposed Frequent Transit Network will route via Jesmond Road to the train station, bypassing the proposed Town Centre network (as indicated in the Drury Opāheke Structure Plan and recent Notice of Requirements for SH22 and the Jesmond Road to Waihoehoe Road West Frequent Transit Network).

Outcome: A walkable catchment for rapid transport stations (such as Drury West train station) is generally regarded to be around 800 m walking distance. In my view the degree of integration between the train station and proposed Town Centre will be low as the distance will generally preclude

¹⁰ Available online <https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf>

walking trips, in addition frequent bus services between the train station and Town Centre are not anticipated by Auckland Transports future public transport network (as indicated in the Drury Opāheke Structure Plan and recent Notice of Requirements for SH22 and the Jesmond Road to Waihoehoe Road West Frequent Transit Network). From a transport accessibility and connectivity perspective, I consider that the proposed Town Centre would be better located near the intersection of SH22/Karaka Road and Jesmond Road.

4 MY REVIEW OF SUBMISSIONS

4.1 Primary submissions

Fifteen submissions related to transport matters were received

- ◆ Submitter 2 – Yu Wang
- ◆ Submitter 5 – Wendy Hannah
- ◆ Submitter 8 – Diocese of Auckland
- ◆ Submitter 11 – Lomai Properties
- ◆ Submitter 28 – Charles Ma
- ◆ Submitter 29 – Andrew Daken
- ◆ Submitter 30 – Soco Homes
- ◆ Submitter 34 – Ministry of Housing and Urban Development
- ◆ Submitter 35 – Auckland Council
- ◆ Submitter 36 – Waka Kotahi New Zealand Transport Agency
- ◆ Submitter 37 – Elly Pan
- ◆ Submitter 39 – Auckland Transport
- ◆ Submitter 40 – Ministry of Education
- ◆ Submitter 42 – Drury South Limited
- ◆ Submitter 43 - Kāinga Ora

Details of the submissions and my comments are provided in Appendix A.

Key themes from submissions regarding transport matters include

- ◆ Proposed internal transport network structure including road alignment, intersection locations, cross section details, and provision for active transport and public transport users
- ◆ Identification, timing, and responsibility for funding and delivery of enabling/supporting transport infrastructure, including the upgrade of SH22 and location and design of new intersections
- ◆ Assumed location of the Drury West train station, and amendments to land use zoning including the form and function of the proposed Town Centre and extent of urban zoning included in PPC51.
- ◆ Revisions to Precinct Provisions.

I generally support submitters requests. However, I do not support the following submitters' requests

- ◆ Soco Homes submission point 30.1. I consider that further detail on roading layouts within and outside the Precinct is not required at this stage, other than as noted in my responses to other submitters. The Precinct does not preclude connectivity to external parcels of land, which I support as this future proofs a connected and permeable transport network
- ◆ Auckland Transport submission point 39.7. Seeks detailed cross sections within the Precinct Provisions. I consider that detailed design of roads is more appropriately determined as part of

future resource consent and engineering plan approval applications, noting that these will be subject to Auckland Transport Standards and Guidelines

- ◆ Auckland Transport submission point 39.5 and 39.11. Seeks that the Precinct Plan provides connection outside of the PPC51 boundary, to Jesmond Road and the future Drury West train station. I consider this is outside the scope of PPC51, as future/indicative transport links cannot be shown outside of the Precinct other than within existing legal road corridors.

I consider the following submitters' requests are best addressed by Council's Reporting Planner

- ◆ Auckland Council submission point 35.18 and Kāinga Ora 43.1. Requests that PPC51 be extended to the eastern side of Jesmond Road
- ◆ Ministry of Housing and Urban Development submission point 34.2 and Waka Kotahi NZTA submission point 36.12. Requests that large format retail be discouraged from establishing in the proposed Town Centre
- ◆ The Catholic Diocese of Auckland submission point 8.2 and 8.3, Charles Ma submission point 28.1, Ministry of Housing and Urban Development submission point 34.7, and Waka Kotahi NZTA submission points 36.1 and 36.5. Request changes to the location and/or size of the proposed Town Centre. I note that I have provided discussion on the lack of integration between the Town Centre and the Drury West train station in Section 3.5 above.

4.2 Further submissions

Four further submissions related to transport matters were received

- ◆ Further Submitter 2 – Yu Wang
- ◆ Further Submitter 6 – Waka Kotahi NZTA
- ◆ Further Submitter 7 – Auckland Transport
- ◆ Further Submitter 13 – Karaka and Drury Limited (the proponent of the private plan change request).

The primary submission from Yu Wang sought to align the local road along the edge of the submitter's property, which I oppose (refer to my commentary on Submission 2.1 in Table 2). The further submission seeks to delete the local road rather than realigning it, which I support in part as I have concerns about the alignment of the local road, as discussed in Section 3.4.2 of this report.

However, I consider that there is merit in including the local road within the Precinct, as it identifies a local road connection between a local road shown in 6.35 Drury 1 Precinct: Precinct Plan 2 and the Town Centre proposed as part of PPC51. I consider that the local road connection should be shown on the precinct plan, but that flexibility is provided within the provisions to allow deviation of alignment, to allow consideration of matters including those identified in Further Submission 2, as part of future resource consent applications.

All other further submissions did not include new information relating to transport matters.

Details of the further submissions and my comments are provided in Appendix B.

5 SUMMARY AND MY RECOMMENDATIONS

The recommendations of my report are summarised below.

I note that the Government announced on 4th June 2021 that the funding for the widening of the Southern Motorway (SH1) between Drury Interchange and a new Drury South Interchange (Stage 2) has been deferred¹¹.

The application documents supporting PPC51 do not include traffic modelling, with Section 7 of the notified Integrated Transport Assessment identifying that the ITA will need to be updated once Te Tupu Ngātahi Support Growth release updated traffic modelling for the future land-uses within the vicinity of PPC51. As such I am unable to determine how the deferral of Drury South Interchange (which would divert a degree of traffic and thus relieve some pressure from the Drury Interchange) may affect the timing of future development within PPC51.

I agree with the requestor's transport expert that urbanisation and capacity improvements to SH22 are required prior to development within PPC51. However, I understand that the RLTP (2021 – 2031) that was presented to Auckland Council's Planning Committee on 24 June 2021 does not include funding for physical works on SH22 between PPC51 and Drury Interchange. While some funding is included for SH22, I understand this is related to securing a designation for this section of SH22 and not the delivery of physical infrastructure. I also understand that SH22 improvements are focussed to the west of the corridor such as the Glenbrook Road intersection, and not the eastern end of the corridor (fronting the site).

My report reflects the Joint Witness Statement in relation to Transport (dated 2 July 2021). Following expert conferencing, the requestor is preparing an updated ITA to address the differing circumstances since the plan change was lodged, as well as updated planning provisions in response to this and various other submitter concerns. However, this information will not be available in time to fully accommodate into this report. Due to this, my views and recommendations in this report are subject to change.

Following the period for further submissions, Te Tupu Ngātahi Support Growth announced that the Drury West train station will be located about 450 m south of the intersection of SH22/Karaka Road and Jesmond Road¹². This is approximately 250 m – 700 m southwest of the indicative location in Council's Drury Opāheke Structure Plan. The train station and Town Centre proposed for PPC51 are approximately 1,300 m apart via existing and potential future roads, compared with approximately 700 m expected as part of the Council's Drury Opāheke Structure Plan.

¹¹ NZUP factsheet South Auckland, published by Waka Kotahi, available online

<https://www.nzta.govt.nz/assets/planning-and-investment/docs/nzup/nzup-factsheet-south-auckland.pdf>

¹² Te Tupu Ngātahi Support Growth: New train stations for Drury and Paerata February 2021 – available online https://www.supportinggrowth.govt.nz/assets/New-train-stations-for-Drury-and-Paerata/2701fa70db/Project-Info-Sheet_New-train-stations-for-Drury-and-Paerata.pdf

A walkable catchment for rapid transport stations (such as Drury West train station) is generally regarded to be around 800 m¹³. In my view the degree of integration between the train station and proposed Town Centre will be low as the distance will generally preclude walking trips, in addition frequent bus services between the train station and Town Centre are not anticipated by Auckland Transport's future public transport network (as indicated in the Drury Opāheke Structure Plan and recent Notice of Requirements for SH22 and the Jesmond Road to Waihoehoe Road West Frequent Transit Network). From a transport accessibility and connectivity perspective, I consider that the proposed Town Centre would be better located near the intersection of SH22/Karaka Road and Jesmond Road.

I recommend that the Precinct provisions identify the following additional transport infrastructure needed to support the development of PPC51

- ◆ The upgrade and urbanisation of SH22 between Jesmond Road and the Drury Interchange
- ◆ A safe access between SH22 and the Precinct, and closure of the existing Burberry Road/SH22 intersection
- ◆ Urbanisation of Burberry Road along its full length when any road connection is made to Drury 1 Precinct.

Should the Town Centre zoning be adopted, I recommend that

- ◆ The provisions and/or Precinct Plan 1 identify that the "Town Centre Local Road" typology needs to cater for cycling and public transport modes
- ◆ In absence of a high-level feasibility study confirming prior to the hearing that the Collector Roads can be extended to the west, such information should be a matter of discretion and an assessment criteria for any subdivision involving vesting of roads shown on the Precinct Plan.

In regard to the Precinct Plan, I recommend that

- ◆ "by others" is removed from the Precinct Plan legend in reference to the Town Centre Local Road and east/west Collector Road intersections with SH22. I note that this is consistent with Waka Kotahi NZTA's further submission regarding Auckland Transport's submission point 39.12, where it states "The Precinct Plan should not refer to the provision of infrastructure by 'others'"
- ◆ In the absence of further design assessment to confirm intersection form, that the three new intersections with SH22 as shown on the Precinct Plan are not identified as "signalised" in the legend
- ◆ In the absence of further design assessment and approval from Waka Kotahi NZTA regarding the location of the three new intersections on SH22, I recommend that a new Special Information Requirement is included in the Precinct Provisions (similar to that I334.9 for the Wairaka Precinct) as follows

IX.9.X Special information requirements

¹³ Understanding and implementing intensification provisions for the NPS on urban development – available online <https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf>

(1) Any new road access to SH22 shall be supported by a Transport Assessment Report and Road Safety Audit, prepared by a suitably qualified transport engineer in consultation with Waka Kotahi NZ Transport Agency, confirming that the location and design of the intersection supports the safe and efficient function of the transport network.

- ◆ I recommend that the alignment of the “Local road with cycle and 3m shared paths” road is altered such that it sits within the Precinct, therefore giving surety that the extent of the connection can be provided
- ◆ I recommend that the Precinct Plan legend is amended to allow the design of the road cross sections to reflect Auckland Transport design standards and guidance at the time of resource consent

“Collector road with ~~cycle and 3m shared paths~~ provision for cycling and walking”

“Local road with ~~cycle and 3m shared paths~~ provision for cycling and walking” and

“Town centre road with provision for public transport, cycling and walking”

APPENDIX A

Submission summary

Table 3: Submission summary (transport matters) and commentary

Submitter and sub point	Summary of submission point / relief sought	Flow comment	Status
Yu Wang: 2.1	Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.	Oppose in part. I consider that aligning the local road along the edge of the submitters property would create an inefficient transport network, as it would result in a “dog leg” in what it supposed to be a direct cycling connection to the Town Centre. However, I have concerns about the alignment of the local road, as discussed in Section 3.4.2 of this report.	Oppose in part. Refer to my discussion in Section 3.4.2
God Save The Flag Ltd c/ Wendy Hannah: 4.1	Approve the plan change conditional on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside PC48 area).	Support, however I consider that this can be addressed via other processes should access be affected. 228 Flanagan Road currently has a sealed carriageway approximately 5.5m wide within a public road corridor approximately 12m wide, adjacent to the Southern Motorway corridor. I consider that the proposed Precinct affect ongoing access to Flanagan Road.	Support request, however, this can be addressed by other processes
The Catholic Diocese of Auckland: 8.2 and 8.3	<p>The submitter considers that</p> <ul style="list-style-type: none"> The Town Centre location does not optimise public transport and particularly the rail network and the future West Drury rail station The Plan Change does not sufficiently consider the effects of the Town Centre location, and associated proposed residential zones, relative to the preferred rail station location ‘Option A’ and increasing importance of the rail network generally The Plan Change is inconsistent with the objectives of the Auckland Council Drury-Opaheke Structure plan when considering post Structure Plan infrastructure initiatives including the preferred ‘Option A’ West Drury rail station location <p>Seeks the following amendments</p> <ul style="list-style-type: none"> The Plan Change is amended so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre, with <p>Amendments to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option ‘A’.</p>	<p>Council’s Drury Opaheke Structure Plan neither proposes nor precludes a Town Centre in this location. From Section 3.3 of the Structure Plan:</p> <p>“A large centre is also needed in West Drury, to the west of SH 1. This is shown in the plan west of SH 1 located on State Highway 22 (SH 22) near Jesmond Road. It will primarily serve the western part of the Drury – Opāheke structure plan area”</p> <p>In my opinion PPC51 fails to deliver integrated land use and transport outcomes in terms of the proposed Town Centre and the Drury West train station, and I consider that some objectives and policies of the Auckland Unitary Plan (AUP) Chapter B2 Urban growth and form are not well achieved.</p>	Support in part, refer to my discussion in Section 3.5
Lomai Properties Ltd: 11.1	Seeks confirmation that PC51 will provide the transport infrastructure requirements to service development without affecting the staging of land release indicated in the Drury Opaheke Structure Plan, in particular Drury West (which includes the submitters land).	Support in part. Refer to my discussion in Section 3.3 of this report.	Refer to my discussion in Section 3.3
Charles Ma: 28.1 and 28.2	<p>The submitter seeks the following relief:</p> <p>(a) PPC 51 be approved as notified, if the proposed Town Centre is to be supported by a Drury West train station located as shown in the DOSP.</p> <p>(b) In the alternative, if the Drury West train station is to be located west of the location shown in the DOSP (particularly west of Oira Road), the submitter supports any amendments to PPC 51 that may be sought by the PPC requestor, Karaka and Drury Limited (“KDL”), to address that change. This would include (but is not limited to) rezoning all of the PPC 51 land for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones</p>	<p>Oppose in part and support in part</p> <p>(a) Oppose. I consider that amendments to the Precinct are required to manage the effects on the transport network. Refer to my recommendations in Section 5 of this report.</p> <p>(b) Support. In relation to the location of the train station and the integration of the surrounding land uses, refer to my response to The Catholic Diocese of Auckland: 8.1.</p>	Refer to my recommendations in Section 5 of this report and response to The Catholic Diocese of Auckland: 8.2 and 8.3
Andrew Daken: 29.1	Concerned that existing transport network, including SH1, will be negatively effected.	Refer to my response to Lomai Properties Ltd: 11.1	Refer to my response to Lomai Properties Ltd: 11.1

<p>Soco Homes Limited c/- Isobel Lee: 30.1</p>	<p>Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.</p>	<p>I consider that the internal transport network proposed by PPC51 does not preclude future development of the submitter's property.</p> <p>I consider that further consideration of future connections to Jesmond Road is required, as discussed in my response to Auckland Transport submission 39.11.</p> <p>I consider that amendments to the Precinct provisions are required to ensure that transport infrastructure is delivered in a coordinated manner with development, refer to my recommendations in Section 5.</p>	<p>Support in part Oppose in part</p>
<p>Ministry of Housing and Urban Development: 34.2</p>	<p>Seeks that the Town Centre Zoning be replaced with Local Centre Zoning, and any consequential amendments.</p>	<p>Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3</p>	<p>Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3</p>
<p>Ministry of Housing and Urban Development: 34.4</p>	<p>Amend IX.3 Policies 1 & 2 to the Precinct provisions as follows: (1)(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.</p>	<p>Support in part. Refer to refer to my discussion in Section 3.5</p>	<p>Refer to refer to my discussion in Section 3.5</p>
<p>Ministry of Housing and Urban Development: 34.5</p>	<p>Seeks to discourage large format retail from the Centre.</p>	<p>Refer to my response to Waka Kotahi NZTA: 36.13</p>	<p>Refer to my response to Waka Kotahi NZTA: 36.13</p>
<p>Ministry of Housing and Urban Development: 34.6</p>	<p>The Structure Plan specifies that SH22 through Drury West should over time be transformed to an attractive urban arterial. However, in the interim will continue to function as a rural highway. The risk is that development within the Precinct in the short and medium term will suit the current rather than the future function and form of the road. Accesses and intersection will need to be designed with consideration to both the current and future form and function of State Highway 22.</p> <p>Seeks amended detailed traffic and urban design assessments, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with:</p> <ul style="list-style-type: none"> the current and future urban arterial form and function of State Highway 22 and; the bulk and location that would support a well-functioning urban arterial. 	<p>Support in part.</p> <p>I recommend that SH22 is urbanised and four laned between Drury Interchange and PPC51 area, prior to any development within PPC51. I consider that, with SH22 being urbanised before development, this will go some way towards address the transport concerns raised by the submitter.</p> <p>Refer to my discussion in Section 3.3 of this report.</p>	<p>Support in part Refer to my discussion and recommendations in Section 3.3</p>
<p>Ministry of Housing and Urban Development: 34.7</p>	<p>The Plan Change and supporting documents are drafted on the assumption that the proposed Drury West train station is located to the immediate south of the Plan Change area (south of State Highway 22). This location is not yet confirmed, and HUD understands that the preferred option is now further west than what has been considered as part of the Plan Change. This change will impact the scale and nature of effects associated with this Plan Change, and many of the technical assessments (for example the Integrated Traffic Assessment) should be updated to reflect this change.</p> <p>Seeks an update to all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.</p>	<p>Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3</p>	<p>Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3</p>
<p>Ministry of Housing and Urban</p>	<p>IX.2 Policy 5 (a) The policy as notified is vague in specifying what 'transport upgrades' are being referred to, as well as directive in implying that 'upgrades' will be needed. Temporary infrastructure-related effects can often be mitigated through network optimisation and other service level adjustments that are not typically considered</p>	<p>Oppose in part. I suggest that "occur concurrently" in terms of infrastructure supply may be interpreted as being in the construction phase, however I consider that the required</p>	<p>Oppose in part I will provide comment on any revised provisions</p>

<p>Development: 34.8</p>	<p>to be 'upgrades'. Such effects-based measures ensure that developers do not face unreasonable development constraints and/or delays. As Standard IX.6.2 requires transport upgrades to occur, the policy should be amended to reflect this.</p> <p>Amend as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct;"</p>	<p>infrastructure needs to be "operational" prior to occupation of land use development.</p> <p>I will provide comment on any revised provisions follow the Requestor's response to submissions.</p>	<p>following the Requestor's response to submissions</p>
<p>Ministry of Housing and Urban Development: 34.9</p>	<p>IX.2 Policy 5 (b) The policy predetermines that upgrades to existing roads will be required. Whether such upgrades are in fact required should be effects-based, taking into consideration the upgrades specifically identified within the precinct</p> <p>Amend as follows: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections."</p>	<p>Support.</p>	<p>Support I will provide comment on any revised provisions following the Requestor's response to submissions</p>
<p>Auckland Council: 35.1 and 35.2</p>	<p>PC 48 does not provide for the strategic integration of transport infrastructure with land use. The provision of such infrastructure works will not be achieved at a rate with which the council (representing the community) can physically and economically cope.</p> <p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <ul style="list-style-type: none"> a) Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. b) Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. c) Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: <ul style="list-style-type: none"> 1. Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. 2. Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). 3. Threshold rules are not used for works to be funded privately but there is no funding agreement in place. 4. Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. 5. Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). 6. Threshold rules are not used in circumstances where the extent and location of works have not been determined yet. 7. Use of prohibited activity status for infringement could be considered. d) Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing. 	<p>Support in part</p> <p>In relation to Council's submission points (a) and (b): I consider that the PPC51 application does not robustly assess the potential effects, nor fully reflect the transport infrastructure needed to mitigate transport effects. Refer to my discussion in Sections 3 and 5 of this report.</p> <p>In relation Council's submission point (c)</p> <ol style="list-style-type: none"> 1. the key pieces of infrastructure that I consider are necessary to be constructed prior to any development being occupied include a safe vehicle access point from PPC51 to SH22, closure of Burberry Road/SH22 intersection, and SH22 upgrade to urban arterial standard. This submission point does not preclude my position. 2. In my view, this submission point would require all transport infrastructure works to be in place prior to, or shortly after, subdivision. The need for multiple new connections to SH22 should be assessed as development progresses. The Provisions should allow for some flexibility for how this is delivered. Refer to my discussion in Section 3.1.3 regarding the requirement to upgrade of SH22 3. In my view, this submission point would require all transport infrastructure works to be in place prior to, or shortly after, subdivision. The need for multiple new connections to SH22 should be assessed as development progresses. The Provisions should allow for some flexibility for how this is delivered. Refer to my discussion in Section 3.1.3 regarding the requirement to upgrade of SH22 4. Agree as this would be ultra vires 5. The proposed precinct provisions do not include GFA thresholds 6. Agree to a certain extent. I am assessing transport effects at a plan change level. I should consider the indicative "footprints" needed to confirm feasibility of upgrades. However, I consider that the detail design is not required at Plan Change, as this will not come until future resource consents and detailed design. 	<p>Support in part. Refer to my discussion and recommendations in Sections 3 and 5 of this report</p>

		<p>7. Council's Planner to consider whether prohibited activity status is warranted.</p> <p>In relation to Council's submission point (d), I support Council's comment, in particular the SH22 upgrade.</p>	
Auckland Council: 35.18	<p>Extend urban zoning (THAB) to the eastern side of Jesmond Road.</p> <p>Jesmond Road is proposed³ to be upgraded to an arterial road. It will serve as the main north-south connection in Drury West and joining with SH22 which in turn connects to SH1. A new arterial extending Jesmond Road further to the south is also proposed. This in turn will connect to a proposed new railway station in Drury West.</p> <p>Collector and local roads also need to be developed that connect the new urban areas including the proposed town centre to this arterial.</p> <p>There is an interdependence between the upgrade of this key road and the development of adjoining land for urban purposes. Urban zoning is required for urban development. Therefore, extending the urban zoning to adjoin Jesmond Road is appropriate. The zoning should be Terrace Housing and Apartment Buildings to be consistent with proximity to proposed RTN public transport.</p>	<p>Neither support nor oppose.</p> <p>I query whether this submission is within the scope of PPC51 and will take advice from Council's Planner.</p> <p>Further to this, changing and/or extending the extent of rezoning would require further assessment of transport effects.</p> <p>I consider that the proposed land uses and Drury West station locations need to be considered in parallel. Refer to my response to The Catholic Diocese of Auckland: 8.1</p>	Council's Planner to advise
Auckland Council: 35.19	<p>Add a policy and standards to provide for increased density near RTN stations including:</p> <p>a) A policy to the effect of: Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</p>	Support in principle	Support I will provide comment on any revised provisions following the Requestor's response to submissions
Auckland Council: 35.20	Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.	Support	Support
Waka Kotahi NZTA: 36.2	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required	Support	Support
Waka Kotahi NZTA: 36.3	The terms active transport and public transport are utilised within the National Policy Statement Urban Development 2020 (NPSUD). It is requested that references referring to pedestrians and cyclists is replaced with active transport to ensure consistency and clarity. For clarity, where the individual term pedestrian or cyclist is used, these should remain.	Support	Support. I recommend Council's Planner adopt proposed amendments
Waka Kotahi NZTA: 36.4	<p>Long term plans for State Highway 22 involve 4-laning the corridor (including a central median), and providing separated walking and cycling facilities on both sides of the corridor. The long term intended form and function is that of an urban arterial, however in the interim will continue to function as a rural highway.</p> <p>Accesses and intersections will need to be designed with consideration to both the current and future form and function of State Highway 22. Further, any proposed access or intersection needs to be supported by detailed traffic assessments, outlining the volume of traffic anticipated and issues such as sightlines, intersection geometry and likely access/intersection form (we also note that the proposed realigned Burberry Road has issues with geometry and intersects State Highway 22 at a sub-optimal angle).</p> <p>Seeks that an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form and function of State Highway 22.</p>	<p>Support in part.</p> <p>I recommend that SH22 is urbanised and four laned between Drury Interchange and PPC51 area, prior to any development within PPC51. I consider that this will address the transport concerns raised by the submitter. Refer to my discussion in Section 3.1.3 of this report.</p> <p>In terms of the new intersections with SH22, I share the submitters concerns about the lack of detailed assessment, however I consider that this does not necessarily need to be confirmed as part of the Plan Change, noting that Waka Kotahi are not opposed to future connections from the Precinct to SH22.</p> <p>I suggest that a new Standard is incorporated into the Precinct Provisions which requires further assessment, in consultation with the submitter, as these new intersections are planned and designed. Refer to Section 3.4.1 of this report.</p>	Support in part. Refer to Section 3.3 and 3.4.1 of this report
Waka Kotahi NZTA: 36.5	IX.1. Precinct Description and IX.4 Precinct Rules (A5)	Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3.	Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3

	<p>Council’s Structure Plan did not anticipate a Town Centre in this location, and reference should instead be to ‘Local Centre’ throughout the precinct description and subsequent provisions.</p> <p>Retain with amendments. Replace all references within this precinct description from “Town Centre” to ‘Local Centre’</p>		
Waka Kotahi NZTA: 36.13	<p>Waka Kotahi has particular concerns about the potential for large format retail developing in this locality. This particular form of retail could potentially serve not just Drury West, but a much wider catchment and consequently generate a larger amount of traffic than what has been assessed in the ITA and which SH22 can safely accommodate. As such, this particular activity has the potential to adversely impact the surrounding transport network, including State Highway 22 and the Drury interchange (SH1/22 intersection). Should large format retail be proposed in this location, the wider effects of any proposal need to be considered, including traffic effects.</p> <p>Add a new Activity to Table IX.4.1 as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.</p>	<p>Support in part.</p> <p>I consider that some risk is presented due to Retail Activity being permitted in Chapter H10, should future retail activity within PPC51 serve a wider catchment and result in higher traffic generation. The mitigation required may be greater than that anticipated by PPC51 should the centre be assumed to serve more of a local catchment.</p> <p>I recommend that Council’s Planner, in consultation with Council’s Market Economics expert, consider the intended form and function of the Town Centre and whether the submitter’s requested relief should be adopted.</p>	<p>Support in part</p> <p>I seek advice from Council’s Planner</p>
Waka Kotahi NZTA: 36.14	<p>IX.6.2 Transport Infrastructure Requirements</p> <p>As per the requestor’s response to Auckland Councils Clause 23 request, no development should occur prior to State Highway 22 being upgraded to four lanes</p> <p>Add: State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure</p>	<p>Support.</p> <p>I recommend that SH22 is urbanised and four laned between Drury Interchange and PPC51 area, prior to any development within PPC51. Refer to my discussion in Section 3.1.3 of this report.</p> <p>Further, refer to my response to Waka Kotahi NZTA: 36.4</p>	<p>Support.</p> <p>Refer to my discussion in Section 3.1.3 of this report and my response to Waka Kotahi NZTA: 36.4</p>
Elly Pan: 37.1	<p>Seeks a provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH22, water, wastewater, stormwater and other methods of transport</p>	<p>Support in part.</p> <p>The key pieces of transport infrastructure that I consider are necessary to be constructed prior to any development being occupied include a safe vehicle access point from PPC51 to SH22, closure of Burberry Road/SH22 intersection, and SH22 upgrade to urban arterial standard.</p> <p>I do not consider that additional upgrades are required for SH1, beyond what is already funded as part of NZUP.</p>	<p>Support in part</p> <p>Refer to my recommendations in Section 5 of this report</p>
	<p>Seeks that Burberry Road not be stopped until an alternative route is in place.</p>	<p>Support.</p> <p>I consider that the alternative alignment for Burberry Road should be operative prior to the closure of the existing Burberry Road / SH22 intersection, and prior to the occupation of any building within the Precinct.</p>	<p>Support.</p> <p>Refer to my recommendations in Section 5 of this report</p>
	<p>Seeks that the alternative access to Burberry Road be of a standard not less than that currently exists</p>	<p>Support, although I consider that the form and function of the realigned section of Burberry Road can be adequately addressed as part of the region-wide rules of the Unitary Plan, Auckland Transport Standards and Guidelines, and future resource consent applications</p>	<p>Support.</p> <p>Does not need to be addressed through Precinct Provisions</p>
Auckland Transport: 39.1	<p>Auckland Transport is concerned that PPC 51 provides no clear indication of how transport infrastructure would be financed and funded. PPC 51 is reliant on major transport infrastructure projects (both bulk infrastructure as well as upgrades to existing infrastructure that is not built to the required urban standard or upgrade to operation services) to be provided by third parties to service and support the rezoning of the precinct area from Future Urban Zone to a mix of Business and Residential zones.</p> <p>The Regional Land Transport Plan 2018-2028 has not identified or allocated funding for major transport infrastructure or new services to support the urbanisation in Drury area before 2028.</p>	<p>Support in part.</p> <p>I consider that the PPC51 application does not robustly assess the potential effects, nor fully reflect the transport infrastructure needed to mitigate transport effects. However, I consider that revised provisions can enable development to occur in an integrated manner. Refer to my discussion in Sections 3 and 5 of this report.</p>	<p>Support in part.</p> <p>Refer to my discussion and recommendations in Sections 3 and 5 of this report</p>

	<p>PPC 51 be declined unless the reasons for this submission, as outlined in the main body of this submission and in this table, including Auckland Transport’s concerns about transport infrastructure and services funding deficit, are appropriately addressed and resolved.</p> <p>Given that there is no certainty around funding and delivery for required infrastructure improvements, if PPC 51 is not declined, there is a need to consider a range of mitigation methods including the potential deferral of development or a review and implementation of land development staging to ensure co-ordination and alignment with the required transport network mitigation</p>		
Auckland Transport: 39.2	<p>Auckland Transport is not supportive of development proposals where there is no provision, or there is inadequate provision, for the necessary infrastructure to enable development to be appropriately serviced, such as the upgrading of the surrounding transport network where it will be required.</p> <p>Auckland Transport does not have funding to provide for any required strategic infrastructure or upgrades to support the development of such land</p> <p>As noted above, the Auckland Plan and the FULSS identify Drury West Stage 1 to be considered for release for urban development in 2018—2022 (1st half, Decade One). Drury West Stage 1 is identified as being development ready from 2022. PPC51 is therefore, when the lead times for making operative plan changes are taken into account, roughly in step with the Auckland Plan Development Strategy and FULSS sequencing.</p> <p>Notwithstanding this, the area is still not infrastructure ready. While the new Drury rail stations (including the Drury West station) is a funded project within the New Zealand Upgrade Programme, there is no current funding for the upgrade of Karaka Road or the Karaka Road/Great South Road intersection and upgrades to Bremner Road and Jesmond Road.</p> <p>Auckland Transport is also concerned the PPC 51 accelerated development may adversely affect the ability of the future transport network to be upgraded to address the cumulative effects of growth associated with urbanisation of the Future Urban land within Drury. PPC 51 itself does not propose any protection for likely future widening requirements.</p> <p>Decline PPC 51, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial</p>	<p>Support in part.</p> <p>I consider that revised provisions can enable development to occur in an integrated manner, including urbanisation of Burberry Road and Karaka Road (SH22). I consider that progressive urbanisation of Burberry Road is acceptable as development occurs. However, when a connection is made to Drury 1 Precinct, the full length of Burberry Road should be urbanised consistent with that of the realigned section of Burberry Road to the south. This ensures a safe and connected network in the instance that traffic from Drury 1 uses Burberry Road.</p> <p>Refer to my discussion in Sections 3 and 5 of this report.</p>	<p>Support in part.</p> <p>Refer to my discussion and recommendations in Sections 3 and 5 of this report</p>
Auckland Transport: 39.4	<p>PPC 51 could lead to development along Karaka Road and Burberry Road without associated frontage improvements. These frontage improvements should ideally be provided for at the time of development by the developer as mitigation of effects generated by each respective site or area.</p> <p>Both roads are currently built, in part, to a rural standard and developers should be required to form the site frontage. Required upgrades would include, without limitation, provision of footpath, kerbs and channels, earthworks to integrate with development levels, cycle facilities, street lights, berm and street trees as well as carriageway widening/upgrading, land vesting and stormwater treatment and conveyance</p> <p>Amend PPC 51 to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road:</p> <ul style="list-style-type: none"> • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements <p>Funding and delivery of the above work</p>	<p>Support in part.</p> <p>I recommend that SH22 is urbanised and four laned between Drury Interchange and PPC51 area, prior to any development within PPC51. I consider that, with SH22 being urbanised before development, this will go some way towards address the transport concerns raised by the submitter.</p> <p>I consider that progressive urbanisation of Burberry Road is acceptable unless a connection is made to Drury 1 Precinct, in which case the full length of Burberry Road should be urbanised consistent with that of the realigned section of Burberry Road to the south. This ensures a safe and connected network in the instance that traffic from Drury 1 uses Burberry Road.</p> <p>Refer to my discussion in Section 3.3 of this report regarding traffic modelling to support future development.</p>	<p>Support in part.</p> <p>Refer to my discussion and recommendations in Section 3.3 of this report</p>
Auckland Transport: 39.5	<p>The requestor has only proposed carrying forward the existing Drury 1 precinct staging provision relating to the intersection of Jesmond Road and State Highway 22. Other than this, there are no new staging requirements proposed.</p>	<p>Support in part, oppose in part</p> <p>Responding to Auckland Transport’s bulleted requests</p>	<p>Support in part</p>

	<p>Managing the potential effects of poorly aligned infrastructure and land use will require strong staging related mechanisms to ensure that the interim effects of the development proceeding ahead of the required transport network and services upgrades are mitigated or avoided. This mitigation needs to be provided by developers in conjunction with or ahead of their development.</p> <p>Auckland Transport is concerned that interim adverse effects may result of the following network improvements are not provided at the right time. This includes:</p> <ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new rail station; • Introduction of passenger transport services to the Precinct Plan area • Any interim improvements required to Karaka Road as it transitions from a high-speed rural state highway to an urban arterial. • Any other transport improvements identified as being required to support proposed development <p>A minor amendment to the text contained within the plan change is also sought to reflect the fact that the interim intersection improvements at the intersection of Karaka Road and Jesmond Road have been undertaken.</p> <p>Amend PPC 51 to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to:</p> <ol style="list-style-type: none"> 1. Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; 2. Early active mode access to the proposed new train station; 3. Any interim improvements to Karaka Road; 4. Introduction of passenger transport services to the Precinct Plan area 5. Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. 6. Any other transport improvements identified as being required to support proposed development 	<ol style="list-style-type: none"> 1. Support. I consider that Burberry Road should be realigned and the existing Burberry Road/SH22 intersection closed prior to occupation of any building. Refer to Sections 3 and 5 of this report; 2. Support in part. I consider that a requirement for the requestor to form active modes access to the train station is not reasonable, as the responsibility for any works outside of PPC51 arguably sit with the Road Controlling Authority or third party land owners, however staging development to align with a connection to the train station may be appropriate and is expected to be discussed as part of the updated ITA. I consider that any new intersection with SH22 would designed in consultation with Waka Kotahi and would include provision for active modes, and would therefore be the basis for any active modes connectivity across SH22 3. Support in part, I consider that SH22 should be upgraded to an urban arterial standard prior to the occupation of any building. Refer to Sections 3.3 and 5 of this report; 4. Support in part, as discussed in my response to Auckland Transport 39.6. However, I consider that the provision of public transport services is the responsibility of Auckland Transport and should not be identified as a requirement in the Precinct Provisions 5. Support 6. Support, refer to Section 5 of this report 	
<p>Auckland Transport: 39.6</p>	<p>PPC 51 does not include general provisions which would enable the consideration of the staging applied to subdivision and development proposed. Where network links cross several properties staging can affect the level of interim connectivity leading to adverse effects including the inability to introduce passenger transport services to new urban areas</p> <p>Amend PPC 51 to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria</p>	<p>Support</p> <p>I consider that the realignment of Burberry Road and connection to the Drury 1 Precinct, as discussed in Section 3.1.3 of this report, would provide Auckland Transport with the ability to run passenger services. I recommend that a suitable Policy is developed between the submitter and the requestor that encourages provision of a connected network that supports public transport as development progresses.</p> <p>Further, refer to submission Kāinga Ora: 43.3, which may provide the basis for discussion.</p>	<p>Support</p> <p>I suggest requestor and submitter discuss appropriate Policy to encourage a connected network with staged development</p>
<p>Auckland Transport: 39.7</p>	<p>Auckland Transport seeks a consistency of approach across Private Plan Change precinct provisions to the use of cross sections which outline the standards to be applied to future road construction. This approach should balance the need for flexibility to respond to changing design standards over time and the need for certainty, particularly where roads have to be constructed over time by a number of different developers.</p> <p>Auckland Transport seeks provisions within Precinct Plans which indicate overall minimum road reserve widths as well as the functional requirements and key design elements for street design. These should be supported by appropriate activity status, matters for discretion and assessment criteria to provide for instances where these provisions are not met.</p>	<p>Oppose in part.</p> <p>I consider that the Precinct Plan already sets out the key functional routes (for example collector roads and cycle routes). Minor amendments are required, refer to my discussion in Section 3.4.3.</p> <p>However, details such as those requested by Auckland Transport are more appropriately determined as part of future resource consent and engineering plan approval applications, noting that these will be subject to Auckland Transport Standards and Guidelines.</p>	<p>Oppose in part</p>

	<p>PPC 51 includes limited material on future road design parameters and Auckland Transport seeks that these be introduced in accordance with the above points.</p> <p>Amend PPC 51 to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to:</p> <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways • Public Transport (dedicated lanes, geometry etc) • Ancillary Zone (Parking, Public Transport stops, street trees) • Berm • Frontage • Building Setback • Design Speed 		
Auckland Transport: 39.8	<p>Auckland Transport requires the future ability to run buses on the collector roads proposed in the plan change area as well as the town centre road link to Jesmond Road. This will enable direct connections between the town centre and both the proposed Drury Central and Drury West rail stations.</p> <p>The Precinct Plan policies and provisions make insufficient reference to the need to provide for the ability to efficiently and effectively provide passenger transport services to the Precinct area and beyond.</p> <p>Amend PPC 51 to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.</p>	<p>Support in part</p> <p>Refer to my response to Auckland Transport: 39.6 and 39.7.</p> <p>I consider that the “Town Centre Local Road” typology needs to cater for freight (local delivery) and public transport movements to support the Town Centre, and suggest that the requestor and submitter discuss a potential amendment to the Provisions and/or Precinct Plan 1 to identify this requirement.</p>	<p>Support in part</p> <p>I suggest requestor and submitter discuss appropriate Provisions and/or amendments to Precinct Plan 1 to enable development to be served by public transport</p>
Auckland Transport: 39.9	<p>Amend PPC 51 to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes</p>	<p>I consider that this submission point is outside of the scope of PPC51 should the requested connection need to pass through privately owned land. The exception to this being the instance where a connection could be made within the existing legal road.</p> <p>Further, refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3</p>	<p>Refer to my response to The Catholic Diocese of Auckland: 8.2 and 8.3</p>
Auckland Transport: 39.10	<p>Auckland Transport supports the identification within Precinct Plans of future network links that need to provide for separated cycle facilities that are separated from the general carriageway. Auckland Transport supports the Precinct Plan’s identification of some such links.</p> <p>Auckland Transport considers that this notation should also be applied to the proposed town centre roads and Karaka Road as well to any reserve networks that may be created via the submission and hearings process, such as may be required to accommodate streams or the gas pipeline.</p> <p>Auckland Transport also seeks that the references to “cycle and 3m shared paths” be replaced with a more general reference to “separated cycle paths on both sides [of the road]” or similar to provide for future design flexibility.</p> <p>Replace the references to cycle and 3m shared paths with a reference to “separated cycle paths on both sides”.</p> <p>Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions.</p>	<p>Support in part.</p> <p>I consider that the submission point regarding the gas line is an asset owner issue. I agree with Auckland Transport’s position that a more general reference to cycle provision should replace the “cycle and 3m shared paths” shown on the Precinct Plan. Refer to Section 3.4.3 of this report.</p> <p>However, I do not support Auckland Transport’s request for these to be replaced with “separated cycle paths on both sides”. I consider that it is more appropriate that the type of cycle facility be determined as part of future resource consent applications, with guidance on facility type taken from Auckland Transport’s Standards and Guidelines at the time of land development.</p>	<p>Support in part.</p> <p>Refer to Section 3.4.3 of this report</p>
Auckland Transport: 39.11	<p>PPC 51 provides for two collector road links and a town centre road link to its western boundary.</p>	<p>Support in part, oppose in part</p>	<p>Support in part</p> <p>Oppose in part</p>

	<p>The general level of connection is supported. However, there is no material to demonstrate the feasibility of continuing the routes to Jesmond Road in a manner that integrates with wider future development on the west side of Jesmond Road. The future arterial status of Jesmond Road necessitates the identification of key east west routes and associated intersections</p> <p>Auckland Transport also considers that there should be a direct east west link from Jesmond Road to the town centre and north south collector network which is capable of accommodating buses.</p> <p>There is a need to provide some certainty and definition of the proposed network which needs to be integrated with that to be applied beyond the precinct.</p> <p>Auckland Transport seeks the following :</p> <ul style="list-style-type: none"> a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is capable of accommodating buses 	<p>(a) I consider that a high-level feasibility study to confirm that the Town Centre roads can be extend to the west would be useful, given the importance of connectivity within the Town Centre. In relation to the collector roads, an understanding of the feasibility of a connection to the west of the precinct would in my view be appropriate around the connection point, but not necessarily the entire length to Jesmond Road.</p> <p>(b) I consider this is outside the scope of PPC51, as future/indicative roads cannot be shown outside of the Precinct.</p> <p>(c) I consider this is outside the scope of PPC51, as future/indicative roads cannot be shown outside of the Precinct. In regard to bus connectivity within the Precinct, refer to my response to Auckland Transport: 39.8</p>	
Auckland Transport: 39.12	<p>Auckland Transport supports in general the provision of a North South Collector Road intersecting with Karaka Road somewhere between Great South Road and Jesmond Road.</p> <p>However, there are some concerns over the feasibility of the location proposed given the presence of the lake and non-optimal angle of entry. McPherson Road also has a substandard clearance under the North Island Main Trunk railway line and upgrading it to a major intersection may increase the risk of larger vehicles using it and striking the rail bridge.</p> <p>In addition, no assessment has been undertaken of traffic generation from the proposed town centre and the implications of this on the design of intersections with Karaka Road or impacts on the operation of Karaka Road over time</p> <p>Auckland Transport seeks the following:</p> <ul style="list-style-type: none"> a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road. b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise. <p>That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process</p>	<p>Support in part.</p> <p>Refer to my response to Waka Kotahi NZTA: 36.4, and my discussion in Section 3.4.1 of this report.</p>	<p>Support in part.</p> <p>Refer to my response to Waka Kotahi NZTA: 36.4</p>
Auckland Transport: 39.13	<p>Auckland has no objection to the provision of an intersection arrangement that prohibits right turning movements at the intersection of the proposed town centre road and Karaka Road.</p> <p>However, Auckland Transport considers that any reference to future signals should be removed unless suitable analysis has been undertaken to demonstrate it will not have adverse effects on the operation of Karaka Road and the proposed traffic signals at Jesmond Road / Karaka Road and the collector road intersection proposed to the east of it.</p> <p>Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.</p>	<p>Support, refer to my discussion in Section 3.4.1</p>	<p>Support, refer to my discussion in Section 3.4.1</p>
Auckland Transport: 39.14	<p>Auckland Transport opposes references within the proposed Precinct Plan to the responsibility for providing the future potential traffic signals at the intersection of the town centre road and Karaka Road and at the intersection of the proposed Collector Road with Great South Road/Karaka Road resting with "others".</p>	<p>Support, refer to my discussion in Section 3.4.1</p>	<p>Support, refer to my discussion in Section 3.4.1</p>

	The responsibility to provide appropriate access should rest with the relevant developers, recognising that there is an intention to designate for the future provision of a 3-legged signalised intersection at the intersection of Great South Road and Karaka Road		
Auckland Transport: 39.17	Until the use and function of State Highway 22/Karaka Road is altered any development along it should note its regional freight role and be considered and designed accordingly. The transport network upgrades, particularly the signalised intersections on Karaka Road, should address the safety issues of general traffic/vehicles turning into the road and be designed and supported by any ancillary road works necessary to avoid adverse effects on the operation of Karaka Road Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation	Neither support nor oppose. Refer to my discussion in Section 3.1.3	Neither support nor oppose. Refer to my discussion in Section 3.1.3
Auckland Transport: 39.18	The Precinct Plan and zone boundary follow property boundaries and propose a north south local road along the western edge of the Precinct Plan area. The boundary and road location need to be reviewed to ensure that development can proceed in accordance with the Precinct Plan However, the property boundaries are disjointed, and part of the road would need to be formed on land outside of the Precinct Plan area which is zoned future urban. This may hamper the ability to develop the adjoining land and form the road That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues	Support. Refer to my discussion in Section 3.4.2 of this report. Also refer to Submitter Yu Wang: point 2.1	Support. Refer to my discussion in Section 3.4.2 of this report
Ministry of Education: 40.1	Seeks amendments to Provisions to acknowledge education infrastructure	Neither support nor oppose. Council's Planner should consider whether matters of discretion for the location of roads should include integration with schools	Council's Planner to consider submission point
Ministry of Education: 40.3	Retain Standard IX.6.2 Staging of Development with Transport Upgrades and Standard IX.6.4 Site Access	Support in part. I consider that the PPC51 application does not robustly assess the potential effects, nor fully reflect the transport infrastructure needed to mitigate transport effects. However, I consider that revised provisions can enable development to occur in an integrated manner. Refer to my discussion in Sections 3 and 5 of this report	Support in part. Refer to my discussion in Sections 3 and 5 of this report
Drury South Ltd: 42.1	The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection	Support in part. Refer to my response to Waka Kotahi NZTA: 36.4, and my discussion in Section 3.4.1 of this report.	Support in part. Refer to my response to Waka Kotahi NZTA: 36.4, and my discussion in Section 3.4.1 of this report
Kāinga Ora: 43.1	The land east of Jesmond Road (identified in Attachment Two to the submission) be rezoned as part of the PPC51 process. <ul style="list-style-type: none">The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019;The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone	Refer to my response to Auckland Council: 35.18	Refer to my response to Auckland Council: 35.18
Kāinga Ora: 43.3	IX.2 Objective (3) should be reworded to be consistent with Policy IX.3 (1)(b): "Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian multi-modal linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities."	Support in principle, although I will provide comment on any revised provisions follow the Requestor's response to submissions. I consider that this submission point is aligned with Auckland Transport: 39.8 and recommend that both submitters and the requestor discuss potential revisions to the Precinct Provisions.	Support I will provide comment on any revised provisions follow the Requestor's response to submissions

Kāinga Ora: 43.5	<p>Kāinga Ora is opposed to IX.3 Policy (5)(a) as it is vague in specifying what ‘transport upgrades’ are being referred to, as well as directive in implying that ‘upgrades’ will be required.</p> <p>The policy may also have an unintended consequence for substantive decision making on subdivision consent applications, where the sequencing of development is dependent on wider (publicly-funded) infrastructure that may be delayed. In such a situation, temporary infrastructure-related effects can often be mitigated through temporary mitigation, while not incurring economic implications for developers due to unreasonable development constraints and/or delays.</p> <p>As Standard IX.6.2 does requires particular transport upgrades to occur, the policy should be amended to reflect this:</p> <p>“Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct”</p>	Refer to my response to Ministry of Housing and Urban Development: 34.8	Refer to my response to Ministry of Housing and Urban Development: 34.8
Kāinga Ora: 43.6	<p>Kāinga Ora generally supports the need to ensure subdivision and development is adequately serviced by infrastructure.</p> <p>However, Kāinga Ora is opposed to IX.3 Policy (5)(b) as it is predetermining upgrades to existing roads being required. Whether such upgrades are required should be effects-based, taking into consideration the upgrades specifically identified within the precinct as being required.</p> <p>The policy should be amended:</p> <p>“Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections;”</p>	Refer to my response to Ministry of Housing and Urban Development: 34.9	Refer to my response to Ministry of Housing and Urban Development: 34.9
Kāinga Ora: 43.7	<p>Kāinga Ora opposes in part the notified wording of IX.6.2 (1) Transport infrastructure Requirements as it contradicts the non-complying activity status that development preceding the upgrades identified in Table IX.6.2.1 would otherwise have under Activity Table IX.4.1 (A6).</p> <p>Kāinga Ora request that the relationship between these two provisions is clarified and amended as-required to avoid administrative ambiguity regarding the proposed precinct.</p> <p>It is suggested that the phrase “...OR must not precede the upgrades outlined in Table IX.6.2.1” be deleted</p>	I will provide comment on any revised provisions follow the Requestor’s response to submissions	I will provide comment on any revised provisions follow the Requestor’s response to submissions

APPENDIX B

Further submission summary

Table 4: Further submission summary (transport matters) and commentary

Submitter and sub point	Summary of submission point / relief sought	Flow comment	Status
Yu Wang: FS2	<p>Support for the Plan Change is provided, with amendments requested to the location of a local road shown on the precinct plan. Refer to attached Planning Memo.</p> <p>The additional assessment presented in the Planning memo contends that:</p> <ul style="list-style-type: none"> ◆ There is no requirement to confirm an exact location or alignment of the local road within PPC51 at this time as significant areas of Future Urban land will remain, which we expect future Structure Planning exercises will seek to masterplan; ◆ There is no constraints or requirements for the local road to be established at this specific location or alignment; ◆ A local road at this location conflicts with the existing dwelling and other site features on the subject property limiting immediate development potential afforded under PPC51; ◆ The road alignment as proposed would isolate a portion of the subject property and potentially prevent functional/logical development of this land in future, and; ◆ The submitter requests the opportunity to review and consider alternative alignments for the proposed local road 	<p>Support in part. Oppose in part.</p> <p>The primary submission sought to align the local road along the edge of the submitters property, which I oppose (refer to my commentary on Submission 2.1 in Table 4).</p> <p>The further submission seeks to delete the local road rather than realigning it, which I support in part as I have concerns about the alignment of the local road, as discussed in Section 3.4.2 of this report.</p> <p>However, I consider that there is merit in including the local road within the Precinct, as it identifies a local road connection between a local road shown in 6.35 Drury 1 Precinct: Precinct Plan 2 and the Town Centre proposed as part of PPC51. I consider that the local road connection should be shown on the precinct plan, but that flexibility is provided within the provisions to allow deviation of alignment, to allow consideration of matters including those identified in Further Submission 2, as part of future resource consent applications.</p>	<p>Support in part, oppose in part.</p> <p>Refer to my discussion in Section 3.4.2.</p>
Waka Kotahi: FS6	Further submissions in support and opposition to other submission points.	No new information is provided with the further submission.	
Auckland Transport: FS7	Further submissions in support and opposition to other submission points.	No new information is provided with the further submission.	
Karaka and Drury Limited: FS13	Submissions in support and opposition to other submission points.	No new information is provided with the further submission.	

APPENDIX C

Clause 23 request summary

23 July 2020

Michael Luong
Auckland Council
Level 23
135 Albert St
AUCKLAND

Dear Michael

AURANGA B2 PRIVATE PLAN CHANGE: CLAUSE 23 REQUEST SUMMARY

Auckland Council (Council) has requested Flow Transportation Specialists (Flow) to review the transportation matters associated with the Auranga B2 Private Plan Change (PPC), which has been lodged by the applicant, Karaka and Drury Limited (KDL).

We sought further information from KDL in our Clause 23 technical note, dated 15 June 2020 (attached for reference). The applicant provided responses, dated 26 June 2020, which we have reproduced in Table 2.

1 CLAUSE 23 SUMMARY AND NOTIFICATION DOCUMENTATION

In relation to requiring further information through Clause 23 to sufficiently assess the application, we are of the view that we have received the necessary feedback through the responses provided to Council and the NZ Transport Agency requests.

The need to obtain further information from the applicant would not alter our view on how the Precinct Provisions should be framed to address the transport effects. It is important to note that while not explicit in the Clause 23 responses to Council, we are aligned with the applicants traffic engineer and planner on what transport mitigation needs to be in place prior to development proceeding in Auranga B2, as set out in the Clause 23 response to the NZ Transport Agency and as discussed in a meeting with the applicant's design team and as set out below in this letter.

With regard to notification, based on the documents lodged we are of the view that the current Precinct Provisions and documentation is not clear on transport matters. Specifically, the provisions do not give sufficient information to lay-persons on how effects of Auranga B2 will be managed and in our view are not framed in a way that will address effects which the applicant's traffic engineer and planner have acknowledged through Clause 23 discussions as being needed prior to development getting underway.

As a result of the above, we seek guidance from you as to the extent to which Precinct Provisions should be amended through Clause 23 so that feedback received can be included and transport effects better understood when notified.

To clarify the above, we consider that the key transport matter relates to the timing of infrastructure needed to support the PPC, and whether this should be addressed by Precinct Provisions or regionwide rules of the Auckland Unitary Plan (Unitary Plan)

We discuss these issues further in this letter. In summary, we consider that

- ◆ In the absence of assessment to confirm otherwise, the upgrade of SH22 between Jesmond Road and the Drury Interchange is required before any development occurs within Auranga B2. We note that a parallel assessment of infrastructure staging may be undertaken by Council, for the Drury area. This parallel assessment may provide further clarification on this matter
- ◆ A safe access between SH22 and the PPC area and closure of the existing Burberry Road/SH22 intersection is required before any development occurs within Auranga B2
- ◆ The applicant's planning and transport experts agree with our position that these two improvements are required before development occurs within Auranga B2
- ◆ The applicant's planner proposes that these improvements can be secured and delivered as part of future resource consent applications using regionwide provision of the Unitary Plan
- ◆ In our experience the regionwide provisions of the Unitary Plan are not sufficient to ensure that these improvements are delivered. Further, we consider that the Precinct should clearly identify what infrastructure is needed to support development, to allow a lay-person to understand the Precinct and make an informed submission
- ◆ We recommend that Council's planner consider whether the Precinct Provisions should be amended (prior to notification) to identify transport infrastructure needed to support the development of Auranga B2

Following notification and review of any submissions, we will provide a summary report on transport matters to support Council's s42a report.

2 DISCUSSION OF CLAUSE 23 RESPONSES

As part of our Clause 23 information requests, we sought further information on the timing, funding, and responsibility of any transport infrastructure needed to support the PPC (Flow Clause 23 requests 1A, 1B, and 6). The applicant provided responses, reproduced in Table 2, which we have summarised below

- ◆ The development of roads is a matter addressed by E27 and E38 of the Unitary Plan, and that no further rules are considered necessary
- ◆ Matters such as road closures can be addressed at the design and consenting stage and do not need to be resolved for PPC level of detail
- ◆ Processes for road widening on state highways are an NZTA matter and to be dealt with by separate Notice of Requirement processes
- ◆ No trigger or mechanisms or limitations on development relating to transport infrastructure are needed

We consider that these responses have a common theme, that being the provision of enabling infrastructure to support the PPC, and whether this can be addressed as part of future resource consent

applications via E27 and E38 of the Unitary Plan and third party delivery. When contemplating this, the following topics are relevant

- ◆ What transport infrastructure improvements are needed to support development of the PPC area and when should they be provided
- ◆ What regionwide provisions of the Unitary Plan are available to Council to ensure these improvements are delivered

We discuss these topics in the following subsections.

2.1 Transport infrastructure improvements needed to support development

Section 14 of the Integrated Transport Assessment¹ (ITA) states that

“The infrastructure upgrades identified by the ITA in the surrounding area are considered critical to ensuring the transport demands of the PPC can be met”

The local and wider area improvements are identified in Section 5 and Tables 13-1 and 13-2 of the ITA, reproduced below in Figure 1. We support the conclusions of the ITA. Of these improvements, we consider that two key improvements are required to be in place before any development within Auranga B2 occurs

- ◆ Upgrade of SH22 to a 4-lane urbanised arterial. This is to support the proposed town centre land use, provide additional traffic capacity between the PPC area and the Drury Interchange, and provide a safe movement on SH22. In absence of traffic modelling to confirm capacity requirements, our recommendation is that this upgrade is required between Drury Interchange and SH22. The requirement for this to be in place prior to any development is consistent with the applicant’s response to Waka Kotahi NZTA’s feedback item 2 (refer to Table 4). We note that a parallel assessment of infrastructure staging may be undertaken by Council, for the Drury area, which will provide further clarification on this matter
- ◆ Provision of a safe access point onto SH22 and closure of the existing Burberry/SH22 intersection if an alternative access point is used. This is required to provide safe access to Auranga B2 before any development occurs. The requirement for this to be in place prior to any development is consistent with Section 2.2.1 of the ITA, and the assessment criteria of the Drury 1 Precinct.

¹ Auranga B2 Proposed Plan Change, Burberry Road, Drury West Integrated Transportation Assessment Report, prepared by Commute Transportation Consultants, dated 13 May 2020

Figure 1: Enabling transport infrastructure, reproduced from the ITA

Table 13-1: Implementation plan

Trigger	Upgrade	Comments	Anticipated cost	Funder
Upgrades from previous Auranga phases: A – PV15 – Drury Precinct Plan 1 and Auranga B1 – PC6 – Precinct Plan 1				
First B1 lot Or First B2 lot	Jesmond / SH22 intersection upgraded to either roundabout or signals	Layout dependant on consultation with NZTA	\$2 million	Developer
Auranga B2 – PPC				
Staged in accordance with B2	Collector Roads	Collector road connections with signalised intersection of realigned Burberry Road, SH22 and McPherson Road	\$unknown	Developer (in stages)

Table 13-2: Other Transport Projects to meet Stage 1 FULSS Growth for Drury West

Infrastructure Project	Comments	Anticipated cost	Funder
SH22 upgrade to four lane urban road with associated signalised intersections and pedestrian / cycling facilities (likely completed in stages)	Supporting Growth currently undertaking a detailed business case	\$75 million	NZTA
SH1 Papakura to Drury South (six lanes plus shared path)	Required for the wider Drury / Pukekohe area	\$423 million	NZTA (construction starts 2021 complete 2025)
Electrification (Papakura to Pukekohe) and construction of rail station in Drury (Drury west)	Required for the wider Drury / Pukekohe area	\$unknown	NZ upgrade programme. Funding committed in January 2020
Pedestrian / cycling links to Rail station	Required for the wider Drury West area	\$unknown	NZ upgrade programme. Funding committed in January 2020
Bus network upgrade linking Auranga B2 to the Drury train stations	Required for the wider Drury West area	\$Unknown	Auckland Transport

During a meeting between Flow, Council, and the applicant's planners (Renee Fraser-Smith and Mark Tollemache) on 10th July 2020, the applicant's Planners confirmed their agreement that the SH22 and Burberry Road upgrades are required prior to development occurring. With the applicant's ITA and further feedback being consistent with our recommendations, our consideration now turns to whether the regionwide chapters of the Unitary Plan provide sufficient assurance that these upgrades will be in place before any development occurs within Auranga B2. We discuss this in the next sub-section of our letter.

2.2 Provision of transport infrastructure improvements via Chapters E27 and E38

In the applicant's responses to Flow Clause 23 requests, the applicant states that the delivery of transport infrastructure and transport services required to support Auranga B2 is a matter that can be addressed by Chapters E27 and E38 of the Unitary Plan as part of future resource consent applications.

We consider that the likely Chapter E27 and E38 activities, standards and assessment criteria that may apply to future resource consents for Auranga B2, which are relevant to wider effects on the transport network, are summarised in Table 1.

Table 1: E27 and E38 standards and matters for discretion that are relevant to wider transport effects

Unitary Plan reference	Aspect	Commentary
E27.6.1	Vehicle Trip Generation	Triggers RD status at 100 dwellings. Matters for discretion include effects on the transport network. Maybe triggered by development in Auranga B2, but can be avoided if development is progressed with sequential stages each less than 100 dwellings.
E27.6.2	Number of parking and loading spaces	Triggers RD status for infringement on min/max parking rates. Matters for discretion include effects on the transport network. Unlikely to be triggered by development in Auranga B2
E27.6.3, E27.6.4	Parking and access design	Triggers RD status for infringement on parking/access design. Matters for discretion include effects on the transport network. May be triggered by development in Auranga B2 but unlikely to have identifiable effects on SH22
E27.6.4.1	Vehicle Access Restrictions	Triggers RD status for any vehicle access onto SH22. Matters for discretion include effects on the transport network. Unlikely to be triggered by development in Auranga B2
E29.9(4)	Special information requirements	The Council may require applications which affect the transport network, including proposals which exceed the trip generation threshold, to include transport assessment prepared by suitably qualified transport planner or traffic engineer
Table E38.4.2	Activity table - Subdivision in residential zones	(A14) Subdivision in accordance with an approved land use resource consent complying with Standard E38.8.2.1 is an RD activity. Matters of discretion include the effects arising from any significant increase in traffic volumes on the existing road network, however the relevant assessment criteria (Policies E38.3(15) to (17)) point to localised/internalised effects on the transport network rather than wider effects.
		(A18) Vacant sites subdivision involving parent sites of 1ha or greater complying with Standard E38.8.3.1 is a D activity. This allows consideration of effects on the wider transport network, however it is not uncommon for applicants to argue that vacant sites do not generate transport effects.

In our opinion, reliance on the regionwide provisions of the Unitary Plan to deliver the large scale enabling infrastructure required by Auranga B2, with effects arising from multiple sites, does not provide surety that these upgrades will be delivered through resource consent conditions. In our experience the regionwide provisions of the Unitary Plan do not adequately provide for an assessment of the cumulative safety and efficiency effects that will result from Auranga B2, should smaller site by site development occur.

We consider that approximately 40% of Auranga B2 could be developed without triggering an assessment of effects on with wider transport network. Development could be delivered such that

- ◆ Vacant subdivision of parent sites greater than 1ha are argued to not generate any traffic movements, and therefore there are no traffic effects to assess
- ◆ Land use consents are packaged for less than 100 dwellings, and therefore not trigger E27.6.1. Further, the threshold of E27.6.1 could be interpreted as the definition of “significant increase in traffic” for E38.12.1(7)(g) for Subdivision in accordance with an approved land use resource consent complying with Standard E38.8.2.1
- ◆ Land use consents comply with car parking and loading space rates, and parking and access design standards, and therefore not infringe E27.6.3 / E27.6.4
- ◆ Subdivision/development is located north of the proposed realignment of Burberry Rd shown in Precinct Plan 1 (shown indicatively in Figure 2), and therefore is in accordance with the Precinct Plan

In such a scenario Council may not have an opportunity to ensure the safety and efficiency effects on SH22 and Burberry Road are appropriately mitigated. We note that there are multiple examples of existing Precincts, and draft Precincts currently being considered by Council, which identify major transport improvements needed to support development within the Precinct Provisions.

Further, we consider that the Precinct should clearly identify what infrastructure is needed to support development, to allow a lay-person to understand the Precinct and make an informed submission.

Figure 2: Potential developable area prior to the realignment of Burberry Road



3 SUMMARY

Key transport infrastructure upgrades to support Plan Changes are commonly identified as part of the overlying Precinct. Examples of Precincts that specify enabling infrastructure include Drury 1, Silverdale 3, and Redhills. This approach allows the cumulative effects of development to be appropriately managed through the staging of enabling infrastructure. Further, we highlight that the Precinct provisions proposed by the applicant include such a mechanism, with Table IX.6.2.1 Transport Infrastructure Requirements identifying the need to upgrade the Jesmond Road/SH22 intersection prior to any subdivision or development within Auranga B2. While this requirement is included, we are not clear why the SH22/Jesmond Road intersection forms a trigger, as access to the Precinct is not through this intersection.

In our experience the provisions of E27 and E38 may not be adequate to address the cumulative effects of Auranga B2, as development may occur without triggering a requirement to assess effects on the transport network. Should an assessment of effects on the transport network be triggered, we have found that E27 and E38 tend to deal with effects on a site by site basis rather than the Plan Change area as a whole. Further, we consider that the Precinct should clearly identify what infrastructure is needed to support development, to allow a lay-person to understand the Precinct and make an informed submission.

We consider that the regionwide chapters of the Unitary Plan, and the proposed Precinct Provisions as they currently stand, do not provide surety that integrated land use/transport outcomes will be achieved. We believe that there is doubt that the cumulative safety and efficiency effects on the transport network will be adequately managed.

In summary, we consider that

- ◆ In the absence of assessment to confirm otherwise, the upgrade of SH22 between Jesmond Road and the Drury Interchange is required before any development occurs within Auranga B2. We note that a parallel assessment of infrastructure staging may be undertaken by Council, for the Drury area may provide further clarification on this matter
- ◆ A safe access between SH22 and the PPC area and closure of the existing Burberry Road/SH22 intersection is required before any development occurs within Auranga B2
- ◆ The regionwide chapters of the Unitary Plan may not be sufficient to ensure that these improvements are delivered, nor that potentially affected parties can make informed submissions on the PPC

We recommend that Council's planner consider whether the Precinct should be amended to identify transport infrastructure needed to support the development of Auranga B2, prior to notification. Following notification and review of any submissions, we will provide a summary report for Council to support the s42a report which will include our discussion of regionwide vs Precinct Provisions regarding transport infrastructure.

Yours sincerely



Mat Collins
PRINCIPAL

enc: T1A200615 Auranga B2 Clause 23 technical note, Flow 15 June 2020

Reference: P:\ACXX\407 Auranga B2 Plan Change\Reporting\L1A200723_FINAL.docx - Mat Collins

Table 2: Clause 23 requests and responses

Flow request (15/06/20)	Applicant response (26/06/20)	Flow response (20/07/20)
<p>1a. Please confirm the “what”, “how”, “when” and “by whom” for the funding and delivery of all transport infrastructure and transport services required to support the PPC. If there is no mechanism to deliver infrastructure that requires third party land, third party process, third party agreement, and/or third-party funding, then the reasonableness of assuming that this infrastructure will be available to support future development should be discussed.</p> <p>1b. Further, please comment on the threshold(s) at which key upgrades identified in Section 5.1 of the ITA and Section 3.2.6(d) of the AEE (four laning of SH22) will be required, and how these thresholds are reflected in the Precinct provisions. The Provisions need to explicitly define the extent to which development activities are limited until each of the roading upgrades discussed is delivered.</p>	<p>Flow (as consultants/specialists to Council’s review team) is seeking a level of detail that is not needed for the PPC. Local and Collector Roads are able to be built in stages as development progresses (this is usual and typical subdivision process). Funding is as per each development. The development of roads is a matter addressed by E27 and E38 of the AUP. No further rules are considered necessary.</p> <p>Similarly matter such as road closures can be addressed at design and consenting stage and do not need to be resolved for PPC level of detail. Road closures rely in standalone statutory processes that cannot be triggered at this stage. Processes for road widening on state highways are an NZTA matter and to be dealt with by separate Notice of Requirement processes. This is not uncommon to be dealt with separately (and included AT’s Mill Road corridor which was notified after the SHA Plan Variation for Flat Bush Stage 3).</p> <p>The other activities/upgrades are not triggered by the PPC (and do not preclude development of the PPC area). As such no trigger or mechanisms or limitations on development relating to these items is needed. The relevant rules associated with creation of new roads to be vested are contained in E38 of the AUP. These apply throughout the region, and it is not considered necessary to have further rules.</p> <p>In addition, the Council Consents Team is able to impose conditions on resource consents deferring commencement until completion of specific infrastructure projects necessary to serve the development (this is not uncommon and has been used through Auranga A to issue subdivision consents under the E38 provisions for bulk wastewater infrastructure).</p> <p>This request item is not a clarification/further information under Clause 23 as this is a request to alter the PPC. Therefore, it is more appropriately addressed via the Council’s 42A report)</p>	<p>Critical item, discussed further in this letter.</p>
<p>2. Please confirm the accessibility of the PPC to the future rail station, and comment on how any barriers (particularly for active transport modes) might be addressed. The obvious barrier being SH22 in its current form. Please comment on what effect delayed delivery of the train station or train services may have on the PPC.</p>	<p>KDL do not anticipate a delay in the delivery of the rail station. The Government in June 2020 announced that the Drury West rail station and rail network is a shovel ready project which is fully funded.</p> <p>The DOSP already addresses the issue of rail and pedestrian connectivity.</p> <p>The design of SH22 is a matter for NZTA. A matter which NZTA must consider is the DOSP in its NORs to ensure appropriate access. The Applicant trusts that Council will correctly exercise its statutory powers under the assessment of NORs to ensure that the outcomes of the DOSP are reflected in the NORs, along with their recommended conditions.</p> <p>The design of pedestrian access south of SH22 is a matter for AT and/or any future Plan Changes (which would be out of sequence with the FULSS staging). The PPC has shown linkages to SH22, which can be continued to service the final location of the rail station once that is known and designed etc. AT must consider is the DOSP in its NORs to ensure appropriate access from SH22 to the rail station. KDL understand these are to be notified by the end of 2020. KDL trusts that the Council will correctly exercise its statutory powers under the assessment of NORs to ensure that the outcomes of the DOSP are reflected in the NORs, along with their recommended conditions.</p> <p>At this time the Applicant cannot comment further after signing confidentiality agreements with Supporting Growth regarding the planned NORs.</p>	<p>No further information requested. As agreed between Flow, Council, and the applicant in a meeting 10 July, the upgrade of SH22 and Burberry Road access is required before any development occurs. Refer to the discussion in this letter.</p>
<p>3. Please confirm how local roads within the Town Centre zone will provide for active modes</p>	<p>All cross sections/typologies will be designed at subdivision stage where they will be subject to the normal consent design (E38 of the AUP) and review from AT to determine that the roads meet the AT design/engineering standards and to ensure sufficient widths for public transport infrastructure can be achieved. Resource consents are required in respect to E38 of the AUP. There is nothing unusual about this process, and no further rules are considered necessary.</p>	<p>This response conflicts with the proposed Precinct Plan, which defines local and collector roads “with cycle and 3m shared paths”. Further, Section 5 of the ITA discusses the proposed road cross sections. The Precinct Plan and ITA cross sections may not be consistent with AT design standards.</p>

		No further information needed, we will make our recommendations based on the application material.
4. Can clarification also be provided as to how the SH22 access upgrades are initiated noting the restrictions on access via Burberry Road in the Drury 1 Precinct until such time as safety upgrades are undertaken. The Auranga B2 Precinct is silent on the need for upgrades to Burberry Road prior to any development, which in our view also needs to extend to capture construction traffic. We recommend that the Precinct Provisions have a Rule, rather than assessment criteria that addresses access from SH22.	<p>The proposed realignment is the proposed safety “upgrade” to Burberry Road as this provides access to the designated Drury West primary school. The PPC proposes the full realignment.</p> <p>Resource consents are required in respect to E38 of the AUP (for subdivision under E38 which as shown already have relevant discretions etc for transport infrastructure). The process would be that a resource consent is sought from the Council as a minimum of a restricted discretionary activity.</p> <p>The rules that are relevant apply on a region-wide basis, and there is no evidence that these rules applying everywhere else in the region are inappropriate. Matters associated with designations (including new intersections which require works within a designation) are addressed by s176 of the RMA in the normal manner.</p> <p>This request item is not a clarification/further information under Clause 23 as this is a request to alter the PPC. Therefore, it is more appropriately addressed via the Council’s 42A report. The inference from the recommendation is that the AUP includes no construction traffic approaches. The existing rules of the AUP do capture construction traffic and are suitable.</p>	Refer to our response to Request 1A
5. Please confirm whether the road typologies in the Precinct Plan align with Auckland Transport design standards and guidelines, and the extent to which the layouts proposed are consistent with equivalent roads already established within the Drury 1 Precinct, and the extent to which the cross section (particularly through the Town Centre) allows for the provision of public transport infrastructure.	<p>The Council’s Specialist is aware that the Applicant has no control over AT and cannot guarantee that AT will allow the roads to remain “the same” during a staged development (even when cross sections are included in Precinct Plans this is no guarantee, as per examples already developed in Belmont, Hingaia, Flat Bush etc).</p> <p>All cross sections/typologies will be designed at subdivision stage where they will be subject to the normal consent design and review from AT to determine that the roads meet the AT design standards and to ensure sufficient widths for public transport infrastructure can be achieved. No additional rules are considered necessary as the roading network can be consented based on the relevant matters in this E38 of the AUP (as already identified in this request)</p> <p>Roads align with the road network of the Drury 1 Precinct, including those consented in the Stage 2B subdivision adjoining Burberry Road, providing a consistent approach to the area.</p>	No further information needed, refer to our response to Request 3.
6. Please undertake traffic modelling (including mode share sensitivity testing) and provide a commentary on potential traffic effects. This should build on the work of the Supporting Growth Alliance, undertaken as part of the Council’s Plan and subsequent Notices of Requirements for the road network. Localised intersection models may be needed to inform the discussion on access strategy regarding the proposed SH22 connections.	<p>The site falls within the Stage 1 FULSS (which is to be development ready by 2022). The Council have not amended this staging though any process, including during its own Structure Planning process for the DOSP.</p> <p>The DOSP has undertaken detailed traffic modelling. The PPC fits within the area of the DOSP, and the opportunity for a town centre and THAB are included in that modelling.</p> <p>Further modelling is unnecessary and the assessments already identify the relevant traffic effects.</p>	<p>The Section 7 of the applicant’s ITA acknowledges the need for modelling. Council’s ITA for the Drury Opaheke Structure Plan clearly states that further assessment is needed for future Plan Changes (refer Supporting Growth Alliance ITA section 8.5). The SGA ITA identifies that the assessment only considered the long term full build out response to the area. Finer grained and staged assessments are needed to support development. Precinct provisions to ensure integrated land use/transport outcomes may be needed.</p> <p>However, no further information is requested. As agreed between Flow, Council, and the applicant in a meeting 10 July, the upgrade of SH22 and Burberry Road access is required before any development occurs. Refer to the discussion in this letter.</p>

7. Please comment on whether Building Frontage controls where Town Centre zoning fronts SH22 were considered.	As noted by Flow, there is an existing Arterial road access restriction which applies to SH22 (and is administered by the E27 provisions (specifically E27.6.4.1), as such no further restriction was deemed necessary. No building frontage controls are considered necessary on SH22.	No further information needed, we will make our recommendations based on the application material.
8. Please confirm how the “Local road with cycle and 3m shared paths” road shown on the Precinct Plan will be secured as a continuous road with a consistent cross section width. Further, please clarify the extent to which the Precinct Plan needs to identify local roads.	As typical in staged large scale greenfield development, roads are often completed in stages over some time, as such the full scale “connectivity” occurs over time. This is not uncommon. Local Roads are to be determined at development stages and are best left to future development to ensure flexibility (and also there is no need for a high level Precinct Plan to demine every level of detail). Rules in E38 already address this at the time of subdivision, including the staging of subdivision. We see no additional rules or annotations on the Precinct Plan are necessary. This are all matters of detailed design at the time of subdivision and development, and consider that the rules that apply to all urban development and subdivision on a region-wide basis can be utilised to address roading networks at the time of resource consent. This is currently how the AUP operates and we consider that no further rules or discretions are required. Future PPCs associated with the remainder of Drury West Stage 1 of the FULSS will address adjoining roads and connections.	No further information needed, we will make our recommendations based on the application material.
9. Please comment on how the proposed roading network may affect properties to the west of the PPC, when compared with the roading layout in Council’s Structure Plan.	As noted in the ITA, the northern most connection (A) is a continuation of the roading network set out (on the ground) by subdivision approved in the Drury 1 Precinct. Thus the east-west A is in the preferred location as per the alignment with the approved Stage 2B Collector Road. Roads identified in the request as (B & C) have the option not to continue west, as there is also a north/south road which bisects both of these. Regardless the notification of the PPC will enable landowners to the west to comment (should they choose to) on the proposed PPC layout. Landowners to the west outside of the PPC area can pursue a PPC or rezoning themselves. However the scope of the PPC relates to the sites within the proposed boundary of the Precinct and rezoning.	No further information needed, we will make our recommendations based on the application material.

Table 3: Auckland Transport’s feedback and KDL responses

AT request (15/06/20)	Applicant response (26/06/20)
1. Could the applicant please provide a high level feasibility/ constructability assessment to confirm that the changes to the proposed road network and where they cross property boundaries, compared to the indicative roads identified in the SGA network, are feasible and practicable and readily capable of being extended across the adjoining properties to Jesmond road. Specifically, for changes of the roads identified as Road A and Road B in Figure 9-2 in the ITA.	See response to Flow Item #9.
2. The ITA indicates that NZTA is responsible for all improvement works along the SH 22 frontage. Could the applicant outline/ clarify whether this includes footpath/berm/frontage works along SH22. Has the berm and walking and cycling been considered?	This is a detailed design matter, and also one which NZTA should be addressing in any NOR.
3. Could you please provide a rough footprint for signalisation of the MacPherson/new collector intersection to confirm it feasible given the presence of the lake and non-optimal angle of entry.	This is a detailed design matter and one that can be dealt with at the time of the Burberry Road realignment.
4. Could the applicant please confirm how the movement of the traffic signals further from the train station than indicatively noted within the SGA ITA may affect the ability for pedestrians to cross and gain access to the station and whether additional crossing facilities may be required to the town centre.	See response to Flow Item #2. Furthermore, the town centre local road intersection with SH22 could also be signalised in future to then link to the rail station (if required).
5. Could the applicant please explain what is the intention behind the rule suggested in Table 1X.6.2.1 around the staging of the intersection of SH22 and Jesmond Road as this intersection is not part of the plan change area	The ITA contains reference to this upgrade in the implementation table (table 13-1) as being required before the first lot of Auranga B2. The staging is only appropriate should the entire SH22 not have been upgraded and would be subject to NZTA approval.

Table 4: Waka Kotahi NZ Transport Agency's feedback and KDL responses

NZTA request (15/06/20)	Applicant response (26/06/20)
<p>1. Further clarification is needed around the residential yields presented in the ITA and if this was based on assumptions or actual development patterns in Auranga A. Table 6-2 of the ITA states that the employment rate for the town centre zone has been used for the mixed-use zone, whereas it appears that mixed use zone is not proposed? While the applicant has assumed that they will be able to generate a lot of jobs, has the applicant assessed the zone for a large residential component which may result in a large number of external trips? A sensitivity analysis may need to be presented, given the town centre zone is permissive.</p>	<p>Residential yields in the ITA have been based on:</p> <ul style="list-style-type: none"> Existing Auranga A based on actual development (Variation 15 or Drury 1 Precinct) Auranga B1 based on previous plan change (PPC6) (and experience with Auranga A) Proposed Auranga B2 based on previous experience and advice from the Applicant's consultants (40-67 dwellings / ha) given the different zoning (mainly Business and THAB) of the site vs Auranga A / B1 <p>Regarding the mixed-use zone it is agreed that this is not provided for in the PPC however this does not change the analysis, as both rates (town centre and mixed use) use the same jobs per ha rate which was based on town centre.</p> <p>In terms of the jobs / residential component in the town centre, there are planning controls in Town Centre zones encouraging job creation. The rates used are also similar to the Council's own Structure planning. While jobs cannot be guaranteed in any zone they can be encouraged through planning.</p>
<p>2. Four laning of SH22 is an SGA project and therefore is only funded for route protection at present. Can the applicant please comment on the provisions that are proposed to ensure that the development will not precede it? Or conversely, at what point is this upgrade required and to what extent? For example, would it only be needed from the site to the interchange or all the way to Paerata?</p>	<p>The upgrade to SH22 would be required before any lots are provided for Auranga B2. SH22 would need to be upgraded from the interchange to (and including) Jesmond Road intersection (and its approaches).</p>
<p>3. The Jesmond Road upgrade rule is overly wordy and difficult to implement. NZTA is currently scoping a project under the Safe Network Programme for some interim safety upgrades on SH22 including this intersection but they won't add any capacity.</p>	<p>The Rule is the same wording as agreed by NZTA in the Plan Change 6 Hearing.</p>
<p>4. Also, please explain why the speed limit was referenced in the aforementioned rule. As per the recent media release, NZTA is permanently reducing the speed limit from Burberry Rd to Paerata to 80km/h and from Burberry Rd to Drury to 60km/h.</p>	<p>The Rule is the same wording as agreed by NZTA in the Plan Change 6 Hearing. Any change in speed limit can be addressed by the detailed design of the intersection.</p>
<p>5. In relation to the Jesmond intersection rule, while NZTA agrees that the intersection needs to be upgraded at some point and would welcome a rule requiring new developments to facilitate upgradation of the intersection before commencing the development, there's no discussion of it in the ITA.</p>	<p>The specific rule is not discussed in the ITA (as the ITA recommended the trigger and new for such a rule, and the PPC text has given effect to that recommendation) however the upgrade is outlined in the implementation table (Table 13-1) specifically for both Auranga B1 and B2 and is required before development of first lot of either Auranga site (including PPC).</p>
<p>6. The ITA mentions that the modelling will be updated once the structure plan has been released. Can the applicant please comment on the timeframe for this?</p>	<p>While it is unclear which land-use scenario the Supporting Growth Alliance (SGA) ITA used, the PPC ITA references the i11.5 scenario which was requested from Auckland Forecasting Centre (AFC). It is understood that this is now the latest land-use scenario that Supporting Growth Alliance are also using in their Detailed Business Cases.</p>
<p>7. Can the applicant also please explain what analysis has been undertaken to assess what would happen if the indicative roads could not be located as proposed? For example, the connection to McPherson Road.</p>	<p>See response to Flow Item #1B.</p>

ATTACHMENT A

**Flow reference T1A200615:
Auranga B2 Clause 23 report**

PROJECT	AURANGA B2 PRIVATE PLAN CHANGE
SUBJECT	CLAUSE 23 INFORMATION REQUESTS
TO	MICHAEL LUONG
FROM	MAT COLLINS
REVIEWED BY	TERRY CHURCH
DATE	15 JUNE 2020

1 SUMMARY

Auckland Council (Council) has requested Flow Transportation Specialists (Flow) to review the transportation matters associated with the Auranga B2 Private Plan Change (PPC), which have been lodged by Karaka and Drury Limited (KDL). The PPC seeks to rezone approximately 33.65 hectares of Future Urban Zoned land in Drury to a mix of Business Town Centre and Residential zones.

This technical note contains Clause 23 information requests relating to the PPC.

2 INTRODUCTION

The Clause 23 requests are associated with the following documents

- ◆ Section 32 Assessment of Environmental Effects Report, prepared by Tollemache Consultants Ltd, dated May 2020, including
 - Appendix 1 Locality Map
 - Appendix 3 Precinct Plan and Auranga B2 text
 - Appendix 4 Section 32 Analysis
 - Appendix 7 Integrated Transport Assessment by Commute Transportation Specialists

We have engaged with Auckland Transport (AT) and Waka Kotahi New Zealand Transport Agency (Waka Kotahi NZ Transport Agency) as part of our review and have included their feedback in separate sections of our report.

3 SITE SUMMARY

KDL is applying for a Plan Change to rezone 33.65 hectares of Future Urban zoned land to a mix of Business Town Centre, Residential Mixed Housing Urban and Residential Terrace Housing and Apartment Building zones.

The PPC area is to the south of the Drury 1 Precinct, also referred to as Auranga A (rezoned via Plan Variation 15) and Auranga B1 (rezoned via Plan Change 6). The PPC area and proposed zoning are shown in Figure 1. The proposal intends to provide for the establishment of approximately 890 residential

dwelling and some 7,000m² Gross Floor Area (GFA) of business activities which includes a supermarket of approximately 3,500m² GFA.

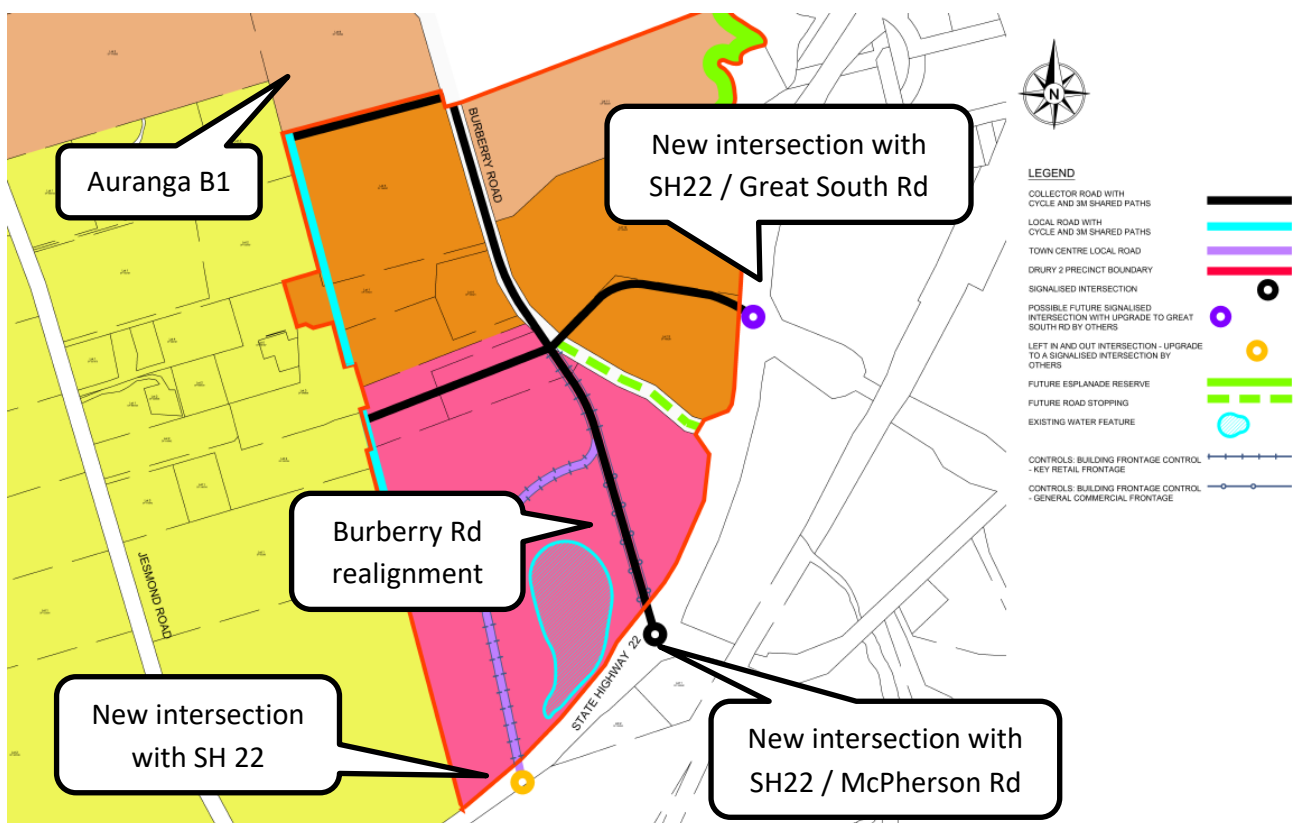
The proposed zones are

- ◆ Business Town Centre (TC) zone: 15.29 hectares
- ◆ Residential Mixed Housing Urban (MHU) zone: 4.61 hectares
- ◆ Residential Terrace Housing and Apartment Building (THAB) zone: 13.75 hectares

The PPC includes the following road network elements

- ◆ Road stopping of the southern end of Burberry Road (which requires a separate Local Government Act process), and realignment of the southern section to form a signalised intersection with State Highway 22 (SH22) at McPherson Road
- ◆ A new east-west collector road to forming a signalised cross intersection with SH22 and Great South Road, although the AEE states that this connection is not needed to support the PPC
- ◆ Burberry Road connecting with Auranga B1 to the north

Figure 1: Auranga B2 PPC area and proposed zonings



4 INFORMATION REQUESTS

Having reviewed the relevant documents provided, we consider that additional information is required to better understand the transport effects and their management. Information requests are summarised below.

Request 1 Explanation: Section 6.9.9 of the AEE states

“Overall, it is considered that the objectives, policies and rules in the AUP (as modified by the PPC) will be sufficient to ensure that development within the PPC area is supported by adequate transportation connections and infrastructure.”

Section 5 of the ITA identifies 6 key upgrades to support the PPC, being

- ◆ the future closure of Burberry Road including at SH22 (as separate LGA process);
- ◆ upgrade of remaining length of Burberry Road to a collector road classification to serve as one of the four connections from the PPC area to the wider road network (SH22);
- ◆ realignment of Burberry Road between the current intersection with SH22 through 6 Burberry Road to 235 m north of that intersection. The realignment will involve extending this leg of Burberry Road southward such that it connects to the McPherson Street/ SH22 intersection thereby forming a cross-intersection. This ‘new’ intersection will be upgraded to a signalise control with dedicated pedestrian phasing and cyclist facilities
- ◆ a new local road between the realigned Burberry Road, through the town centre area and meeting SH22 at a left in/ left out intersection
- ◆ New collector road commencing from the point of realignment on Burberry Road and extending to the western site boundary consistent with a new collector road identified as part of the structure plan
- ◆ New collector road commencing from the point of realignment on Burberry Road, and will extend in a north-east direction, connecting to SH22 at the intersection with Great South Road. This intersection will also be signal-controlled and provide dedicated pedestrian and cyclist facilities on each approach

However, the Precinct does not identify how or when these key upgrades will be delivered, the order in which they will be delivered to support construction, and anticipated development staging.

The Precinct Plan (Attachment 3 to the AEE) identifies two new intersections onto State Highway 22 as being provided “by others”, being the new east/west collector road and the new town centre local road. It is not clear why the applicant assumes these intersections are the responsibility of a third party (presumably Waka Kotahi NZ Transport Agency). It would be helpful if the applicant can clarify whether input from Waka Kotahi NZ Transport Agency has been sought regarding these new intersections.

The PPC also proposes the road stopping of part of Burberry Road, however we understand that road stopping can only be undertaken by a road controlling authority. It would be helpful if the applicant can

clarify whether input from AT and Waka Kotahi NZ Transport Agency has been sought regarding the proposed road stopping.

Section 3.2.6(d) of the AEE identifies that the Precinct provisions reflect the upgrade to SH22 (to four lanes). However, there is no mention of this upgrade within the Precinct provisions.

Request 1. A) Please confirm the “what”, “how”, “when” and “by whom” for the funding and delivery of all transport infrastructure and transport services required to support the PPC. If there is no mechanism to deliver infrastructure that requires third party land, third party process, third party agreement, and/or third-party funding, then the reasonableness of assuming that this infrastructure will be available to support future development should be discussed.

B) Further, please comment on the threshold(s) at which key upgrades identified in Section 5.1 of the ITA and Section 3.2.6(d) of the AEE (four laning of SH22) will be required, and how these thresholds are reflected in the Precinct provisions. The Provisions need to explicitly define the extent to which development activities are limited until each of the roading upgrades discussed is delivered.

Request 2 Explanation: The AEE states that the PPC maximises the establishment of development density near the future rail station (location as identified in Council’s Structure Plan and the timing of which is planned for 2024 by central government funding). However, it is not clear how connection between the PPC and future rail station will be enabled. Policy IX.3(5)(a) points to connecting the development to future public transport facilities, however how this will be achieved is not apparent.

Request 2. Please confirm the accessibility of the PPC to the future rail station, and comment on how any barriers (particularly for active transport modes) might be addressed. The obvious barrier being SH22 in its current form. Please comment on what effect delayed delivery of the train station or train services may have on the PPC.

Request 3 Explanation: The Town Centre is likely to generate a high demand for active transport modes, as it serves the wider Drury 1 Precinct. Policy H10.3(15)(b) points to supporting a range of transport modes, and the ability to change transport modes, within Town Centres. How will local roads within the Town Centre zoning respond to, and encourage, trips by walking, cycling and other active modes?

Request 3. Please confirm how local roads within the Town Centre zone will provide for active modes.

Request 4 Explanation: The PPC is a contiguous with the recently rezoned land to the north, being areas covered by Plan Variation 15 (Auranga A) and Plan Change 6 (Auranga B1), which is covered by the Drury 1 Precinct. The Drury 1 Precinct indicates the requirement to undertake works to the intersection of

Burberry Road and SH22 to ensure there are safe and appropriate connections prior to the connection of Drury 1 to Burberry Road. However, this upgrade is not mentioned in the Precinct provisions for the PPC, either to enable development of the PPC nor as a prerequisite to connecting Burberry Road to “Road 3” within the Drury 1 Precinct.

Request 4. *Can clarification also be provided as to how the SH22 access upgrades are initiated noting the restrictions on access via Burberry Road in the Drury 1 Precinct until such time as safety upgrades are undertaken. The Auranga B2 Precinct is silent on the need for upgrades to Burberry Road prior to any development, which in our view also needs to extend to capture construction traffic. We recommend that the Precinct Provisions have a Rule, rather than assessment criteria that addresses access from SH22.*

Request 5 Explanation: The Precinct Plan proposes “Collector road with cycle and 3m shared paths” and “Local road with cycle and 3m shared paths” road typologies. Although Section 5 of the ITA states that final road cross sections will be determined at resource consent stage, the Precinct Plan predetermines this to an extent. It is not clear whether the typologies indicated in the Precinct Plan align with Auckland Transport’s Roads and Streets Framework and Transport Design Manual.

Request 5. *Please confirm whether the road typologies in the Precinct Plan align with Auckland Transport design standards and guidelines, and the extent to which the layouts proposed are consistent with equivalent roads already established within the Drury 1 Precinct, and the extent to which the cross section (particularly through the Town Centre) allows for the provision of public transport infrastructure.*

Request 6 Explanation: Section 6 and 7 of the ITA discuss the trip generation and potential effects on the transport network. It notes that the ITA is to be updated once the SGA Southern ITA is released. This assessment should consider the sensitivity of public transport mode share, including where delivery of bus/train services lag behind development of the PPC area, and any proposed staging. We will review the trip generation and traffic modelling assessment once the report is updated.

Request 6. *Please undertake traffic modelling (including mode share sensitivity testing) and provide a commentary on potential traffic effects. This should build on the work of the Supporting Growth Alliance, undertaken as part of the Council’s Plan and subsequent Notices of Requirements for the road network. Localised intersection models may be needed to inform the discussion on access strategy regarding the proposed SH22 connections.*

Request 7 Explanation: The Precinct Plan proposes Building Frontage controls for the proposed local roads within the Town Centre zone. Included within these controls are limitations on vehicle accesses. The Town Centre zone also has frontage with SH22 but frontage controls are not proposed, although we

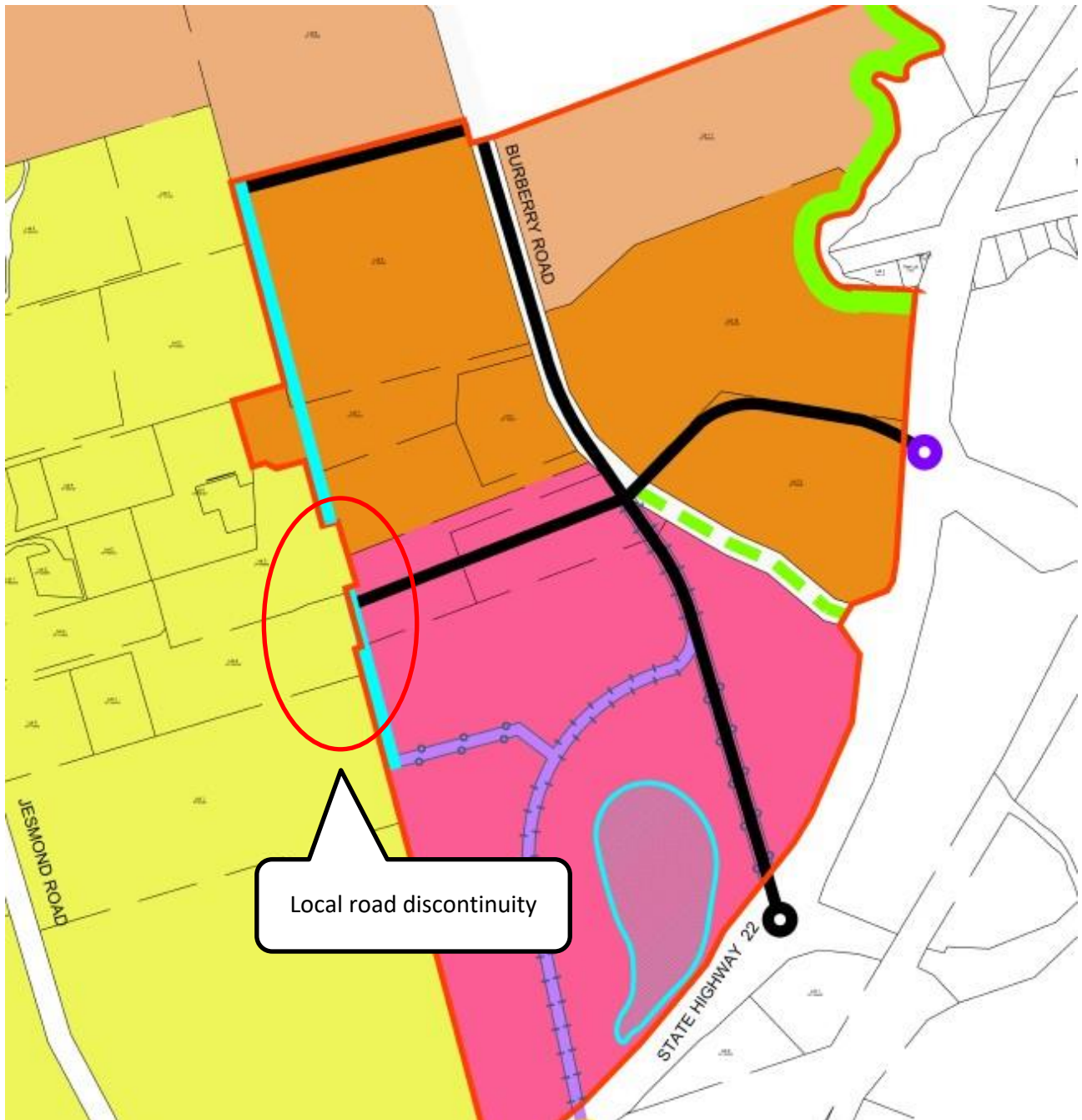
note that SH22 is identified as an arterial road and therefore subject to vehicle access restrictions. Did the applicant consider whether frontage controls onto SH22 were appropriate?

Request 7. Please comment on whether Building Frontage controls where Town Centre zoning fronts SH22 were considered.

Request 8 Explanation: The Precinct Plan shows a “Local road with cycle and 3m shared paths” road typology running approximately north/south along the western boundary of the PPC, as shown in Figure 2. This road is interrupted by land parcels outside of the PPC area, which calls into question the feasibility of delivering a connected road network.

Request 8. Please confirm how the “Local road with cycle and 3m shared paths” road shown on the Precinct Plan will be secured as a continuous road with a consistent cross section width. Further, please clarify the extent to which the Precinct Plan needs to identify local roads.

Figure 2: Precinct Plan with local road discontinuity

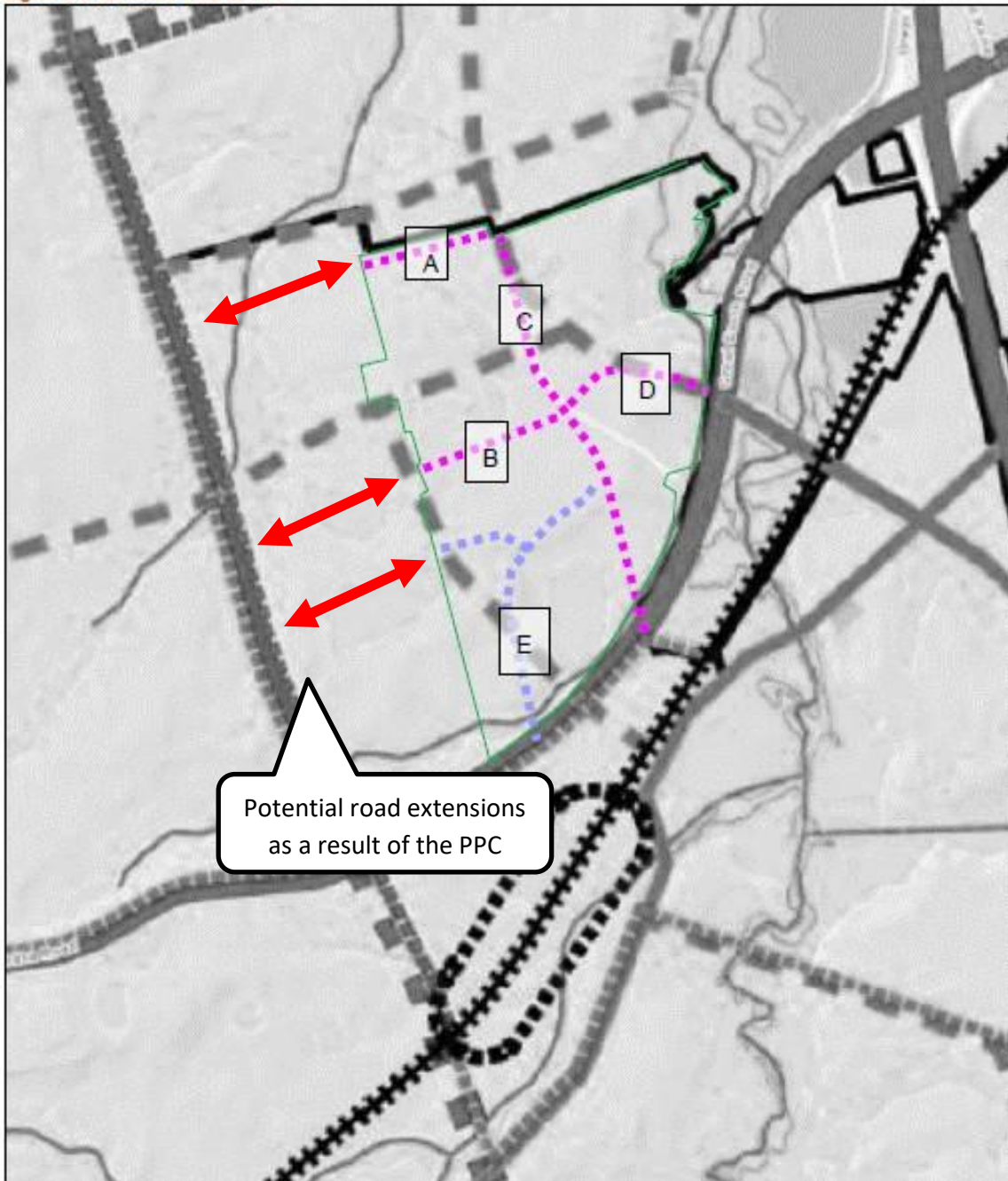


Request 9 Explanation: Figure 9-2 of the ITA (reproduced below in Figure 3) identifies how the PPC roading network deviates from that proposed by Council's Structure Plan. The proposed alterations to the future road network will generate different effects to property owners to the west of the PPC, when compared with Council's Structure Plan. Given this change, and that these property owners may consider that they had already had input into the future roading network as part of submission/public engagement on Council's Structure Plan, please comment on how the PPC may affect these land owners.

Request 9. Please comment on how the proposed roading network may effect properties to the west of the PPC, when compared with the roading layout in Council's Structure Plan.

Figure 3: Structure Plan vs PPC roading network (Flow annotations in red)

Figure 9-2: Structure Plan vs PPC



5 AUCKLAND TRANSPORT FEEDBACK

As part of our review we engaged with Auckland Transport and have reproduced their feedback below. We note that their comments have been presented below and we recommend that they form part of the Clause 23 information request, as applicant responses may go some way towards addressing Auckland Transport's immediate concerns.

1. Could the applicant please provide a high level feasibility/ constructability assessment to confirm that the changes to the proposed road network and where they cross property boundaries,

compared to the indicative roads identified in the SGA network, are feasible and practicable and readily capable of being extended across the adjoining properties to Jesmond road. Specifically, for changes of the roads identified as Road A and Road B in Figure 9-2 in the ITA.

2. The ITA indicates that NZTA is responsible for all improvement works along the SH 22 frontage. Could the applicant outline/ clarify whether this includes footpath/berm/frontage works along SH22. Has the berm and walking and cycling been considered?
3. Could you please provide a rough footprint for signalisation of the MacPherson/new collector intersection to confirm it feasible given the presence of the lake and non-optimal angle of entry.
4. Could the applicant please confirm how the movement of the traffic signals further from the train station than indicatively noted within the SGA ITA may affect the ability for pedestrians to cross and gain access to the station and whether additional crossing facilities may be required to the town centre.
5. Could the applicant please explain what is the intention behind the rule suggested in Table 1X.6.2.1 around the staging of the intersection of SH22 and Jesmond Road as this intersection is not part of the plan change area

6 NZTA FEEDBACK

As part of our review we engaged with Waka Kotahi NZ Transport Agency and have reproduced their feedback below. We note that their comments have been presented below and we recommend that they form part of the Clause 23 information request, as applicant responses may go some way towards addressing Waka Kotahi NZ Transport Agency immediate concerns.

1. Further clarification is needed around the residential yields presented in the ITA and if this was based on assumptions or actual development patterns in Auranga A. Table 6-2 of the ITA states that the employment rate for the town centre zone has been used for the mixed-use zone, whereas it appears that mixed use zone is not proposed? While the applicant has assumed that they will be able to generate a lot of jobs, has the applicant assessed the zone for a large residential component which may result in a large number of external trips? A sensitivity analysis may need to be presented, given the town centre zone is permissive.
2. Four laning of SH22 is an SGA project and therefore is only funded for route protection at present. Can the applicant please comment on the provisions that are proposed to ensure that the development will not precede it? Or conversely, at what point is this upgrade required and to what extent? For example, would it only be needed from the site to the interchange or all the way to Paerata?
3. The Jesmond Road upgrade rule is overly wordy and difficult to implement. NZTA is currently scoping a project under the Safe Network Programme for some interim safety upgrades on SH22 including this intersection but they won't add any capacity.
4. Also, please explain why the speed limit was referenced in the aforementioned rule. As per the recent media release, NZTA is permanently reducing the speed limit from Burberry Rd to Paerata to 80km/h and from Burberry Rd to Drury to 60km/h.

5. In relation to the Jesmond intersection rule, while NZTA agrees that the intersection needs to be upgraded at some point and would welcome a rule requiring new developments to facilitate upgradation of the intersection before commencing the development, there's no discussion of it in the ITA.
6. The ITA mentions that the modelling will be updated once the structure plan has been released. Can the applicant please comment on the timeframe for this?
7. Can the applicant also please explain what analysis has been undertaken to assess what would happen if the indicative roads could not be located as proposed? For example, the connection to McPherson Road.

Reference: \\Flow-dc01\Projects\ACXX\xxx Auranga B2 Plan Change\Reporting\T1A200615 Auranga B2 Clause 23.docx - Mat Collins

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

20th July 2021

To: David Mead, Hill Young Cooper Ltd., consultant to Auckland Council

From: Rebecca Skidmore, RA Skidmore Urban Design Ltd.

Subject: Private Plan Change – PPC51 Drury 2 Precinct, Drury – Urban Design, Landscape and Visual Effects Assessment Review

1.0 Introduction

- 1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to urban design, landscape and visual effects.
- 1.2 I am an Urban Designer and Landscape Architect. I am a director of the consultancy RA Skidmore Urban Design Limited and have held this position for approximately seventeen years.
- 1.3 I hold a Bachelor of Science degree from Canterbury University (1987), a Bachelor of Landscape Architecture (Hons) degree from Lincoln University (1990), and a Master of Built Environment (Urban Design) degree from Queensland University of Technology in Brisbane (1995).
- 1.4 I have approximately 25 years professional experience, practising in both local government and the private sector. In these positions I have assisted with district plan preparation and I have assessed and reviewed a wide range of resource consent applications throughout the country. These assessments relate to a range of rural, residential and commercial proposals.
- 1.5 I regularly assist councils with policy and district plan development in relation to growth management, urban design, landscape, character and amenity matters.
- 1.6 I am an accredited independent hearing commissioner. I also regularly provide expert evidence in the Environment Court and I have appeared as the Court's witness in the past.
- 1.7 In writing this memo, I have reviewed the following documents:
 - The lodged PPC request Planning Assessment by Tollemache Consultants Ltd. (May 2020), and specifically the Urban Design Assessment and Neighbourhood Design Statement by Ian Munro (dated May 2020, contained in Attachment 8), the Landscape and Visual Effects Assessment report by LA4 Landscape Architects (dated 17/04/2020, contained in Attachment 9);
 - The Clause 23 further information response (dated 26 June 2020);
 - The summary of submissions, and complete submissions where relevant and further submissions.

1.8 My review is carried out in the context of:

- (a) The Resource Management Act;
- (b) The National Policy Statement: Urban Development;
- (c) The Auckland Unitary Plan: Regional Policy Statement;
- (d) The Auckland Plan: 2050;
- (e) The Drury-Opāheke Structure Plan; and
- (f) The Southern Structure Area – Neighbourhood Design Statement

2.0 Key urban design, landscape and visual effects Issues

2.1 The following sections address key urban design, landscape and visual effects, having considered the assessment reports and submissions received. These can be summarised as the following topics:

- Location of the Business: Town Centre zone and its relationship to the train station.
- Extent and type of zones.
- Height variation controls.
- Role of lake as amenity features.
- Provision of open space.
- Visual effects from SH22.
- Mana whenua values and design.

3.0 Applicant's assessment

Urban Design Assessment and Neighbourhood Design Statement (“UDA”)

3.1 Section 2 of the UDA provides an overview of planning and design for the wider Auranga environment. This section importantly traverses the design testing and considerations regarding the location of a town centre in relation to the future railway station (yet to be determined) and the final determination of the urban structure for Auranga A and B1. This section is supported by a number of attachments that depict the design testing and concept evolution that has occurred. As described, Auranga B1 covers approximately 83ha with capacity for upwards of 1,350 residential units. The location of confirmed sites for a primary and secondary school is identified.

3.2 KDL's input to and design testing in relation to the Council's Drury-Opāheke Structure Plan (August 2019) (the “SP”) is described. As noted, the final SP identified a 'Centre' (of unassigned category) in the general location now proposed by the PPC. The report confirms that the assessment has had regard to the Neighbourhood Design Statement that supports the SP. However, as this is a non-statutory document, greater weight was given to operative planning instruments.

- 3.3 Section 3 of the report sets out the urban design framework for assessing the PPC. The key sections of the Auckland Unitary Plan (the “AUP”) that have informed the assessment framework include Appendix 1 (structure plan guidelines), Section B2 RPS (urban growth and form), Section H6 (Terrace House and Apartment (“THAB”) zone) and Section H10 (Business: Town Centre (“BTC”) zone). I agree with the summary of assessment topic provided. I note that since the report was written the National Policy Statement: Urban Development (the “NPS:UD”) has come into effect.
- 3.4 Section 4 sets out a brief site and context description. The section notes the 1.2 ha lake within the PPC area as a ‘potentially iconic amenity feature’. The report summarises that the lake was either created or enlarged as a result of landform change when SH22 was formed. The report does not note the considerable topographical variation across the PPC area, with land generally falling from the north to south. Contour information was provided in response to the Council’s request for further information.
- 3.5 Section 5 sets out an urban design summary of the proposal. It notes that the PPC relies on standard AUP zones. It notes that the proposal is anchored by a town centre that comprises approximately 8 ha of developable land. The report describes the development proposal as being based on the principle of the ‘movement economy’ bringing together four key elements including: employment potential; rail station; residential; and Drury West centre.
- 3.6 I note that while this section sets out a preferred location for the Drury West rail station and the rationale for this, a final location for the rail station has not been determined or provide for by way of a designation. I note that the latest plans for the station from the Supporting Growth Alliance (“SGA”) (2021) show the station location further to the south west (west of Jesmond Road) than the location indicated in the SP.
- 3.7 The summary of this section of the UDA notes that the Town Centre is not likely to be a retail-dominated centre but a destination offering amenity, shopping, living and working opportunities.
- 3.8 Section 6 of the report sets out an assessment against the topics identified in Section 3. This section provides a detailed analysis that is clearly linked to outcomes sought by relevant AUP and SP provisions. While I agree with many aspects of the assessment provided, there are a limited number of key aspects that I disagree with. These are discussed further in the following section.
- 3.9 Section 6 provides overall conclusions. I agree with the conclusion that the PPC land is logically located and well suited to accommodate a town centre and to support local high-density residential land-uses. However, I only consider this to be the case if the Centre is well integrated with the future railway station. The zone configuration proposed is generally consistent with the SP. While the proposed re-zoning has been informed by a number of detailed masterplanning exercises, there remains a critical element of uncertainty that impacts on the suitability of the proposed zone structure. That is confirmation of the rail station location.
- 3.10 At a more detailed level, I consider there are a number of matters that require further consideration and amendments to the Precinct provisions. These are discussed in Section 4 below.

Landscape and Visual Effects Assessment (“LVEA”)

- 3.11 Section 3 of the LVEA describes the Site and its surrounding context as it currently exists. It identifies key features in relation to landform, land-use, streams and watercourses, and vegetation.
- 3.12 While the existing environment exhibits rural and rural residential characteristics, the Future Urban zoning of the land, together with the SP for the area, indicates a likely future environment that will undergo fundamental change from rural to urban. In my opinion, that change is relevant in considering potential landscape and visual effects. While that change is not noted in the site and context analysis section, it is referred to in the body of the assessment.
- 3.13 The report does not set out the statutory framework for assessing the PC before the assessment in Section 4. Rather it sets out relevant provisions following in Section 5. I note that this section does not include reference to the SP.
- 3.14 An evaluation of the proposal is set out in Section 4 of the LVEA. The assessment relates to natural character effects, landscape effects, and visual effects.
- 3.15 I agree with the assessment in relation to natural character effects. In relation to the assessment of landscape effects, the LVEA report notes that while the proposal will result in the loss of rural character there are a number of positive landscape outcomes associated with the development. However, it is unclear how the PC will ensure these outcomes are achieved. Further discussion of this matter is set out in the following section.
- 3.16 While I agree with the viewing audiences identified in relation to the assessment of visual effects, I consider there are a number of aspects of the PC that have not been adequately considered. These are discussed further in the following section.
- 3.17 While I agree that the fundamental change from a rural to urban landscape is appropriate in this location given the future urban zoning and the SP for the area, I consider a number of aspects of the PC require further consideration/amendment. These are discussed further in the following section.

4.0 Auckland Unitary Plan Framework

- 4.1 The section 42a report sets out a detailed description and analysis of the relevant regional policy statement provisions for considering the plan change. In terms of a consideration of urban design, landscape and visual effects matters following is a summary of the key provisions that have guided my review.
- 4.2 A key overarching objective for urban growth and form (Section B2.2) is to create a ‘quality compact urban environment’ (Obj. B2.2.1(1)). The objective for creating a quality built environment (B2.3.1(1)) seeks to ensure subdivision, use and development does all of the following:
- Respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;
 - Reinforce the hierarchy of centres and corridors;

- Contribute to a diverse mix of choice and opportunity for people and communities;
 - Maximise resource and infrastructure efficiency;
 - Are capable of adapting to changing needs; and
 - Respond and adapt to the effects of climate change.
- 4.3 Supporting Policy 2.3.2(1) seeks to achieve this by managing the form and design of subdivision, use and development to do all the following:
- Supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;
 - Contribute to the safety of the site, streets and neighbourhood;
 - Develop street networks and block patterns that provide good access and enable a range of travel options;
 - Achieves a high amenity and safety for pedestrians and cyclists;
 - Meets the functional, and operational needs of the intended use; and
 - Allows for change and enables innovative design and adaptive re-use.
- 4.4 Other relevant policies relate to provision of access for all people using a variety of modes, providing a range of building forms to support choice to meet the needs of Auckland's diverse population, and balancing the main function of streets as places for people and as routes for the movement of vehicles.
- 4.5 A number of objectives for residential growth (B2.4.1) address the way intensification supports a quality compact urban form (B2.4.1(1)), are attractive, healthy and safe (B2.4.1(2)), are located in relation to centres, public transport, social facilities or employment opportunities (B2.4.1(3)) and increase the housing capacity and choice Auckland's diverse and growing population (B2.4.1(4)).
- 4.6 Objective B3.3.1 seeks to ensure effective, efficient and safe transport integrates with and supports a quality compact urban form. Supporting Policy 5 sets out how the integration of subdivision, use and development with transport is to be achieved. This includes encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods.

5.0 Assessment of urban design, landscape and visual effects and management methods

Urban Design

Location of BTC zone and relationship to Railway Station

- 5.1 The location of the BTC zone is generally consistent with that depicted in the SP. However, the SP indicates a Centre extending to Jesmond Road. The SP does not identify the type of centre zone to be applied. The document notes that within the SP

area a large main centre is required and this is depicted close to and east of the SH1 interchange adjacent to existing Drury village. This is currently proposed by PC48 as a Business: Metropolitan Centre. The report also notes that a large centre is also needed in West Drury, to primarily serve the western part of the SP area. In addition smaller centres are shown in the plan and located to service local areas.

- 5.2 In my opinion, the BTC zone is appropriate to perform the function and accommodate the mix of uses anticipated for a Centre in this location.
- 5.3 The UDA report sets out a detailed summary of the extensive design testing that has been carried out to determine a suitable location for the BTC zone as part of engaging with the SP process and in planning for the wider Auranga development.
- 5.4 A critical part of that design testing has been a consideration of the relationship of the Centre to a new train station. The Site is bounded by SH22 and the rail line is some distance further to the south. Location of a Centre on the northern side of SH22 will always have challenges in achieving integration with and good connectivity to a new rail station. In particular, the scale and function of SH22 and the topography, limits connectivity from the Site to the south. The UDA report sets out a rationale for a preferred location of the rail station as far east of Jesmond Road as possible. A station location in this vicinity is depicted in the SP. However, the final location of the train station, with a supporting designation, has not yet been confirmed.
- 5.5 The most recent consultation documentation from the Supporting Growth Alliance depicts the rail station location further west, and as a result, also further south from the SH22/Jesmond Road intersection. This location would further reduce the accessibility between the rail station and the proposed Town Centre.
- 5.6 If the BTC zone is confirmed in the location proposed by PPC51 and the rail station proceeds in the location to the west of Jesmond Road, the ability to establish additional business and commercial activity to directly integrate with the rail station could be compromised. This would not achieve the policy direction set out in the RPS of achieving integration between land-use and transport in a way that reduces demand for private vehicle trips. In my opinion, the relationship of a new town centre to, and integration with, the planned passenger rail service is critical to achieve the quality compact urban form sought by the RPS.
- 5.7 Without certainty of the final location of the train station and associated land-use in its immediate vicinity, it is not possible to confirm the suitability of the BTC zone. If the train station is located east of Jesmond Road, I consider a clear and strong urban design rationale has been provided for the location of the BTC zone. Even in this location, there are challenges to providing good active mode connectivity between the station and the Centre. These primarily relate to the barrier created by SH22, the topography and the challenges to achieving land-use activation between the two areas. If the station is located west of Jesmond Road, the rationale for the BTC zone location is severely weakened.
- 5.8 If the BTC zone is confirmed in this location, I consider the proposed distribution of Residential: Terrace House and Apartment Building ("THAB") and Residential: Mixed Housing Urban ("MHU") is appropriate.

BTC Height Variation Control

- 5.9 The PC proposes a height variation control of 27m to apply to the BTC zone. There is no clear rationale as to how this height has been determined as the most appropriate height for this location, other than to use the land resource efficiently. The UDA report is not supported by any modelling depicting development to this height within the BTC zone. In particular, the way buildings of this height would relate to the topography of the Site and the likely building typologies that would result and how the achievement of the key retail frontages, supporting the role of these streets as having a key pedestrian focus would be achieved.
- 5.10 If the BTC zone is considered to be appropriate in this location, in the absence of further analysis, and considering the role of this Centre in relation to the surrounding context, I consider a height variation control of 19m with 2m enabled for roof form (resulting in a maximum height of 21m) would be more appropriate in this location. I note that buildings of greater height may be appropriate in certain locations within the zone and could provide useful wayfinding markers and support the creation of a varied and interesting townscape. Exceeding the permitted height standard is a restricted discretionary activity and the suitability of additional height can be considered as part of a resource consent process.

Role of Lake as Amenity Feature

- 5.11 The UDA report places considerable emphasis on the role of the lake as an important amenity feature, considering it to be essential, in conjunction with the town centre and future rail station, to assist to attract high-density development on the basis of a high-quality amenity for new residents to enjoy.¹ The report also notes that “the lake will provide a unique amenity for the centre and give it a sense of place that will be distinctive in south-Auckland centres”².
- 5.12 I agree that the lake is an important amenity feature that contributes to the rationale for the BTC zone location and has the potential to make a positive contribution to the quality of urban environment and its distinctive sense of place. However, there is little in the PC provisions to reinforce its role as a key feature in the urban environment. The lake is depicted on the Precinct Plan and it is referenced in Policy IX.3(2)(e). In my opinion, in order to achieve the amenity function described in the UDA report, the lake should be used as a key structuring element for the urban environment and good public access should be provided to and around its edges. Surrounding development should provide a positive interface. I note that the key streets on the Precinct Plan do not form an edge to the lake, reducing the function of this feature to contribute to the amenity of the Centre by providing good visual connections to it along key street alignments.
- 5.13 The PC largely relies on the generic zone provisions to ensure suitable development outcomes are achieved in relation to the lake. In my opinion, the Precinct description, policy framework, assessment matters and criteria for subdivision and development and new buildings should be expanded to emphasise the role this feature plays in contributing to the amenity and sense of place for the evolving town centre. In particular, ensuring the lake is a key structuring element and providing visual and public physical connections to and around the lake with adjacent development creating a positive edge should be reinforced.

¹ Para. 6.2(i), p.27, Urban Design Assessment and Neighbourhood Statement, Ian Munro, May 2020

² Para. 6.11(e), *ibid.*

Provision of Open Space

- 5.14 The UDA notes that there is no identified need for additional open space on the Site³. Providing public open space within town centres is important to create public environments for people to gather and interact. This is a key component of creating a quality environment and a focus for commercial, community and civic activities. Public spaces contribute to the attractiveness of a place to live, work and visit. While streets form an important part of the public realm, other open spaces are also important. In particular, the creation of an urban plaza as an open space focus within the town will be important.
- 5.15 The PC relies on the underlying zone to ensure provision of suitable open space within the town centre. In my opinion, given the 'greenfields' nature of development, it would be helpful to indicate a suitable location for delivery of a civic plaza space on the Precinct Plan. This would ensure that provision of such a space in an appropriate location is not lost as various different applications for subdivision and development are made. In my opinion, a suitable location would be easily and directly accessed from the Town Centre local road (identified on the Precinct Plan as a key retail frontage) and the lake. Assessment matters and criteria should be provided for the delivery of the civic plaza.

Landscape and Visual Effects

Role of Open Space

- 5.16 The visual assessment section of the LVEA report notes the role of the green network in assisting to break up the expansiveness of the development, while acknowledging that the proposal will entirely change the landscape currently experienced when viewed from surrounding areas.⁴ However, it is unclear what green network is being referred to here. A limited number of stream corridors at the periphery of the Precinct will require restoration. However, other than this, the PC does not propose any specific requirements for the provision of open space, particularly within the BTC zone which will accommodate the greatest scale of development.
- 5.17 In its description of the Site, the LVEA identifies a large area of mixed exotic tree plantings on the eastern side of the lake. These trees are located towards the boundary with SH22. In my opinion, these trees would make a particular contribution to the amenity and character of a future urban environment. In my opinion, it would be helpful to indicate the location of these trees as a landscape feature on the Precinct Plan and include an assessment matter and criteria for subdivision and development to consider the retention and integration of some of these trees in the development proposal.

BTC Height Variation Control

- 5.18 The LVEA report notes the potential visibility of development within the PC area from the wider environment, particularly in relation to the increased height limit proposed for the BTC zone. The report notes that the development enabled would demarcate the town centre, providing a visual cue and direction as well as adding coherence and interest to the PC area. The report does not include any analysis of why 27m has been determined as the most suitable height and the analysis is not supported by any graphic images

³ Para. 6.14, p. 35, Urban Design Assessment and Neighbourhood Statement, Ian Munro, May 2020

⁴ Para. 3.34, p.10, Landscape and Visual Effects Assessment, LA4 Landscape Architects, 17/04/2020

depicting the scale of development proposed in relation to heights enabled in the surrounding context.

- 5.19 In the absence of this analysis, I consider a more conservative height limit in this location is appropriate. As set out above, I consider a permitted standard of 21m (19m +2m for roof design) would be more appropriate in this location. This height, together with the other provisions that influence the form of development in the BTC zone, would still provide a suitable differentiation and marker of the Centre and enable a varied townscape.

Visual Effects from SH22

- 5.20 The LVEA identifies visual amenity effects in relation to the surrounding road network as a key area requiring consideration. In relation to views from SH22 (Karaka Road), the report notes that road users are unlikely to be particularly sensitive to future development. I agree that the fleeting nature of views reduces viewer sensitivity but I also note the large numbers of people that will view the town centre from this corridor. The State Highway status of the road corridor, limits the way properties can access the road (with no vehicle access enabled). The LVEA report notes that extensive street tree plantings and planting associated with the Town Centre will assist in integrating the built development into the landscape and provide a vegetated framework of appropriate form and scale.⁵
- 5.21 In my opinion, the general zone provisions do not contain any specific provisions that will result in the outcome described. There is a risk that development (both within the BTC zone and THAB zone) will back onto SH22 creating an unsightly appearance from the corridor and when travelling towards the Town Centre from the railway station. In my opinion, given the importance of the relationship of the Precinct to land to the south (and its connection to the future railway station), specific policy guidance, an assessment matter and criteria for subdivision and development and new buildings should seek to ensure a positive, high visual quality outcome is achieved at the interface between the Precinct and SH22.

6.0 Submissions

- 6.1 I have reviewed the summary of submissions and full submissions where these raise matters relevant to urban design, landscape and visual effects considerations. I have also reviewed the further submissions. The submissions raise a number of relevant matters that can be grouped into the following topics:

- Extent and type of zones;
- Relationship of PC to Train Station;
- Height Variation control;
- Mana Whenua Values and Design.

- 6.2 Each of these topics is discussed in turn.

⁵ Para. 4.37, p. 10, Landscape and Visual Effects Assessment, LA4 Landscape Architects, 17/04/2020

Extent and type of zones

- 6.3 A number of submissions support the proposed zoning. Others seek amendments. A number of submissions address the extent and type of business zoning proposed, recommending the scale of centre be reduced and it be zoned Business: Neighbourhood Centre or Business: Local Centre, to service the immediately surrounding neighbourhood rather than a wider catchment. As noted above, the UDA report sets out the extensive design testing and a strong urban design rationale for BTC zone location. However, the rationale for the type, location and extent of zone is linked to the final location of the train station. This is discussed further below. I note that the type of Business zone and its location is generally consistent with the outcomes sought by the SP (both depicted in the spatial plan and described in the text).
- 6.4 The submission by Kāinga Ora (#43) seeks the BTC zone to be extended further to the west to include the property they own at 41 Jesmond Road and the THAB zone to extend further up the eastern side of Jesmond Road (including their property at 85 Jesmond Road). The submission by Auckland Council (#35) also seeks the PPC area extend to Jesmond Road to accommodate THAB zone. This extension of the PPC area and the zones sought by Kāinga Ora would be consistent with the SP. However, I note that the submissions are not supported by any detailed analysis of the land or design testing to demonstrate how this area would integrate with the PPC zoning, particularly the BTC zone. Therefore, these submissions are not supported.

Relationship of PC to train station

- 6.5 As set out in Section 4 above, the appropriateness of the location and type of Business zone is linked to the final location of the train station. At this time, there remains uncertainty about that location. The submissions by the Ministry of Housing and Urban Development (#34) and NZTA (#36) seeks that technical assessments are updated to consider the preferred station location west of Jesmond Road and updated provisions are prepared. The submission by Charles Ma (#28) seeks the BTC zone be removed if the train station is located west of Oira Road. The submission by the Catholic Diocese of Auckland (#8) opposes the town centre zone and the extent of THAB zone as it does not optimise public transport, and particularly the rail network and the future West Drury rail station.
- 6.6 The location of the train station and the ability to achieve good connectivity from the BTC to it is a critical issue to determine the appropriate distribution of zones and supporting provisions. In terms of urban design considerations, until there is some certainty around the train station's location, an assessment of the suitability of the PC provisions cannot be made.
- 6.7 If the railway station is located in the westerly location currently promoted by the SGA, it would be more appropriate to locate a Town Centre zone immediately adjacent to and directly integrated with that station. Further analysis would be required to determine an appropriate extent of THAB zoning in relation to the rapid transit stop. Consideration would be required to determine the appropriate zoning and extent to give effect to Policy 3(c) of the NPS:UD, which requires building heights of at least 6 storeys within at least a walkable catchment of existing and planned rapid transit stops. There is no definition of a 'walkable catchment' in the NPS:UD. It is generally accepted that a distance of 800m enables an easy 10 minute walking connection. However, in relation to a main transport hub such as a railway station, a greater distance may be acceptable. A finer grain

analysis of connectivity would assist in determining the appropriate extent of the THAB zone. I note that a recent paper by Auckland Council on walkable catchments⁶, determined that as a guide around 800m from a rapid transit network stop represents a walkable catchment. However, consideration needs to be given to a range of factors, such as topography, street crossings, block sizes, land use mix, traffic volumes, to determine a sensible catchment boundary.

- 6.8 In my opinion, if a BTC zone is determined as more appropriately located directly adjacent to and integrated with the Drury West train station, it would be appropriate to locate a Business: Neighbourhood Centre (“BNC”) zone or Business: Local Centre (“BLC”) zone within the PPC51 area to serve the surrounding residential catchment. Further analysis would be required to determine the most appropriate location and extent of this zone.

Height variation control

- 6.9 The submission by the Ministry of Housing and Development (#34) seeks the height variation control applying to the BTC zone to be reduced from 27m to 19.5m. While in principle supporting the proposed re-zoning to a mix of residential and business centre zoning, the submission considers the scale of activity proposed is over and above what was anticipated in the SP. The submission notes that providing for 6 storeys is recommended as this is the minimum required under the NPS-UD around a rapid transit stop. Of course, the final location of the transit stop and the walkable catchment around that is not yet known. As set out above, I recommend that if the proposed location and extent of the BTC zone is confirmed, a height of 21m (19m + 2m to provide for roof design) would be appropriate. This would allow 4m for a ground floor and then 3m floor to floor above, enabling 6 storeys.
- 6.10 The submission by Kāinga Ora (#43) seeks a height variation control of 19.5m to be applied to the THAB zone, including the additional area requested extending to Jesmond Road. The need to enable additional height in order to be consistent with Policy 3 of the NPS:UD depends on the final location of the train station. I note that if 6 storeys is to be accommodated, 19.5m provides little flexibility for design and additional height for roof forms.
- 6.11 Without greater certainty of the train station location, I cannot provide advice on the suitability of enabling additional height.

Mana Whenua values and design

- 6.12 The submissions by Ngāti Te Ata Waiohua (#33) and Ngāti Tamaoho (#44) seek the PC to incorporate Te Aranga Maori design principles in design concepts, account for natural and cultural landscaping in the project design, confirm park edge designs adjacent to waterways, use only native planting and protect ridgelines, hilltops and wetlands.
- 6.13 The proposed Precinct provisions do not make any reference to Mana Whenua values and how these could suitably be integrated in the design process and outcomes for the new urban environment to create a quality environment with a distinctive sense of place. In my opinion, it would be appropriate to reference Mana Whenua values in the Precinct description and include policy direction regarding how these can be respected through

⁶ Paper to Planning Committee “NPS:UD 2020 – Implementing the intensification provisions – walkable catchments and qualifying matters”, 01/07/21

the application of Te Aranga Design Principles in the design of subdivision and development. The incorporation of these principles will be most importantly integrated in the design of the public realm.

- 6.14 I note that while riparian planting will comprise mostly native species, in street environments, native tree species are not always the most appropriate to thrive and create a suitably vegetated environment. I do not think it is appropriate to require exclusive planting of native species in the Precinct.

7.0 Conclusions and recommendations

- 7.1 The wider area is undergoing a fundamental change from rural/rural residential to urban.
- 7.2 Structure planning has been carried out to co-ordinate this transition in the wider Drury-Opāheke area. The development of the SP involved detailed analysis and input from a broad range of stakeholders. In my opinion, the distribution of zones proposed is consistent with the SP.
- 7.3 A key issue that is yet to be resolved is the final location of the Drury West train station. The barrier created by SH22, topography, alignment of the railway line, and constraints on land-use in its immediate vicinity, create challenges to achieving a business centre on the northern side of SH22 that achieves good connectivity with the rail service.
- 7.4 The PC is predicated on the location of the future train station being east of Jesmond Road, as indicated in the SP. If the station is located to the west of Jesmond Road (and therefore also further south), the location of a BTC zone as proposed by the PPC would have a diminished connection with the train station and the synergy between the two would be greatly diminished. The latest location preferred by the SGA (February 2021) is to the west of Jesmond Road, which differs to that shown in the SP. If the train station is confirmed in this location, the location and extent of the BTC zone in PPC51 would undermine the potential to locate and integrate a suitable business centre with the rapid transit stop.
- 7.5 Until the final location of the train station is determined, it is not possible to confirm the suitability of the zoning proposed and whether it will give effect to the NPS:UD and RPS. Therefore, it is recommended that the PC is not determined until the final location is confirmed.
- 7.6 If the train station location is confirmed as east of Jesmond Road, having reviewed the PC UDA and LVEA reports and the submissions received, I consider that the proposed zoning is generally suitable. However, the following matters should be further addressed through amendments to the PC provisions:
- Amend height variation control for BTC zone to 19m + 2m for roof form (21m);
 - Expand the Precinct description, policy framework, assessment matters and criteria for subdivision and development and new buildings to emphasise the role the lake plays in contributing to the amenity and sense of place for the evolving town centre. In particular, ensuring the lake is a key structuring element and providing visual and public physical connections to and around the lake with adjacent development creating a positive edge should be reinforced;

- Indicate a suitable location for a civic plaza on the Precinct Plan, being somewhere that is easily accessed from the Town Centre local road (with key retail frontage) and the lake – reinforcing an axis between the two. Provide assessment matters and criteria for delivery of the plaza space;
 - Identify the stand of mature trees adjacent to the lake and the SH22 frontage on the Precinct Plan as a distinctive landscape feature. Include an assessment matter and criteria for subdivision and development to consider the retention and integration of some of these trees in the development proposal;
 - Include specific policy guidance, an assessment matter and criteria for subdivision and development and new buildings to ensure a positive, high visual quality outcome is achieved at the interface between the Precinct and SH22;
 - Expand the Precinct description to reference Mana Whenua values in the Precinct. Include policy direction regarding how these can be respected through the application of Te Aranga Design Principles in the design of subdivision and development. Include appropriate assessment matters and criteria.
- 7.7 If the train station location is confirmed as west of Jesmond Road, it would be more appropriate to locate a BTC zone immediately adjacent to and integrated with the railway station. Within the PPC51 area further analysis would be required to determine the extent of THAB zoning in relation to a walkable catchment of the rapid transit stop. A BNC or BLC zone would be appropriate within the PPC area to service the surrounding residential catchment. Further analysis would be required to determine the appropriate location and extent of this zone.
- 7.8 Other comments relating to the inclusion of additional provisions for the Precinct, relating to the role of the lake as an amenity feature, identification of the stand of mature trees on the Precinct Plan, ensuring a suitable interface with SH22, and acknowledging Mana Whenua values in the design of subdivision and development remain relevant.

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AURANGA PC51

ECONOMIC REVIEW

Client: Auckland Council

Project No: 51894

Date: July 2021



SCHEDULE

Code	Date	Information / Comments	Project Leader
51894.2	July 2021	Report	Tim Heath / Phil Osborne

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1. INTRODUCTION

Property Economics has been engaged by Auckland Council to undertake a review of the economic assessment submitted by Karaka and Drury Limited as part of the Auranga B2 Private Plan Change 51 (PC51) to the Auckland Unitary Plan (Operative in Part) which proposes to establish a new residential suburb and town centre in Drury West. The town centre component is the focus of this economic review.

This includes a review of the economic assessment by Urbacity dated May 2020.

This review is not intended to provide an exhaustive outline of every economic matter raised in the Urbacity report, but traverse matters of primary economic significance and form an economic position on PC51 to assist the reporting planner in framing a formal position on PC51 in their s42A report.

As an overarching general comment, Property Economics has a level of comfort around the general thrust of PC51 and its desire to enable a range of residential typologies and densities across the subject land with the central focal point being a new town centre. The development of residential activity in the broader area of Drury West over time is supported in Council's Drury-Opaheke Structure Plan.

There are four substantive economic aspects addressed in the Urbacity report. These are:

1. Centre catchment for Drury West;
2. Centre status;
3. Drury rail station and employment; and



4. Effects of the town centre.

The initial stages of the Urbacity report assesses PC51 and the background context within the surrounding environment and zoning framework. It outlines the rationale for the town centre as proposed and its ability to attract employment opportunities (retail and non-retail).

The Urbacity report identifies the following benefits:

- Take pressure of Auckland's motorway system
- Increase levels of self containment (goods / services/ jobs) south of the city
- Complement the city's major airport
- Reduce trips and travel times south
- Meaningfully increase economic value and capacity south of the city
- Improve the performance of rail by creating a multi-directional station tied to employment density as a centrepiece of the town centre
- Increase public transport use and make the Auranga Town Centre a transit-oriented development (TOD)
- Bring a sense of civic to the south through a mixed-use town centre.

While these benefits are agreed with these are not site or development specific and are equally likely to be generated by the main Drury (East) Centre across State Highway 1, or a centre location elsewhere in Drury West, and therefore are not considered unique benefits.

The Urbacity report suggests¹ the Auranga Town Centre train station location was fixed during the process in April 2019 during the drafting of the Drury – Opaheke Structure Plan process, and 'that plan' puts the rail station at a nexus with the Auranga Town Centre.

This is no longer the case with train stations now proposed to be relocated about 1km further west of the Auranga Town Centre. This reduces the economic benefits outlined in the Urbacity report with many of the identified benefits relying on a strong association of the train station being part of the wider town centre. This will be discussed in more detail later in the review.

Centre Catchments

The catchments for the Auranga Town Centre is focused on Drury West which is projected to experience significant residential growth over the next 30 years. The core catchment for the centre will be the Drury West area, and this centre is proposed to be the primary commercial centre on the western side of SH1 in Drury. Based on Property Economics analysis for the Drury-Opaheke Structure Plan a town centre is likely required in western Drury to assist in meeting Drury West's frequently required retail activities and commercial services.

¹ Urbacity report, pg 9, paragraph 3



Centre Status

The Auranga Town Centre is part of a wider hierarchy of centres designed to meet the retail and commercial requirements of the growing community.

The Auckland Unitary Plan has several business zones that are designed to be indicative of the role and function of an associated centre. There is a clear hierarchy in the city's commercial centre network from the Auckland Central City (CBD) at the top servicing and attracting people from around the region and beyond, through to Neighbourhood centre shops at the bottom predominantly servicing its immediate local area for convenience goods and services.

The objective of the Town Centre Zone is to provide for a wide range of activities, delivering a focal point of commercial, community and civic activities for the surrounding area, allowing for (generally) four to eight story buildings and provide for residential intensification. In my view, from an economic perspective and based on its proposed land use composition, scale and development intensity, the Auranga Town Centre as proposed satisfies this objective, as any centre with this range of activities and size would in Drury West.

The Town Centre Zone is usually characterised by strong links to public and private transportation opportunities and is further characterised by "Retail Streets".

According to the Unitary Plan:

"Some street frontages within the zone are subject to a Key Retail Frontage Control or General Commercial Frontage Control provisions. Key retail streets are a focus for pedestrian activity within the centre. General commercial streets play a supporting role. Development fronting these streets is expected to reinforce this function."

It is clear the Auranga Town Centre is pitching itself as the main commercial centre in Drury West. This would seem a practical status given its strong links to major arterials and SH1, and therefore the centre has a high level of road accessibility to give support to this status.

Complementing this would be a range of smaller local and neighbourhood centres to service more immediate markets in Drury West. An example of this is PC61 Waipupuke which is proposing a neighbourhood centre and is significantly smaller scale centre in the hierarchy.

Under the Auckland Unitary Plan (Operative in Part) provision which indicates a neighbourhood centre zone is for single corner stores or small shopping strips located in residential neighbourhoods. This commonly includes your local takeaway shop, dairy and convenience services like hairdressers. These centres provide frequent retail and commercial service needs to local community and passers-by and as such are scattered through the residential areas. Ideally, residents are able to walk or have to drive only a short distance to their local Neighbourhood Centre and they are not designed to rely on public transport

Given the above, and the fact that town centres across Auckland have a wide variation in centre size, Property Economics has comfort in the town centre status of the Auranga Centre. At a strategic level, this comfort is transferable to other locations in Drury West given my position



that one new town centre can be supported by the Drury West market in the future, complemented by a range of smaller local and neighbourhood convenience centres.

Proposed Town Centre and Employment

The Urbacity report outlines how the town centre location drives many desired economic outcomes. These are high level and generally agreed including benefits to:

- Ability to manage traffic and the centre to act as a 'home domain' to traffic flow.
- The site is of sufficient size to accommodate growth and deliver economics and social benefits to the community.
- The site has existing regional and local roads capable of supporting an urban centre.

There is also a few locational benefits placing a meaningful reliance on the location (as then proposed) of the train station. This was particularly related to employment benefits including:

- Ability to unlock the economic capacity of the land in and around the proposed rail station.
- Uses existing infrastructure to connect both sides of the rail and does not need additional expensive infrastructure investment to tie both sides of the rail line together.

The new train station location circa 1km west of the proposed town centre would diminish these benefits, albeit the exact quantification of by how much has not been determined.

Counterbalancing these diminished benefits are the additional opportunities the new train station location may generate. For example, the land in between the proposed town centre and new train station location is likely to be able to support a increased extent / level of higher density residential development, yielding more residential dwellings than previously determined.

It is considered the new train station location, being around 1km west and separate from the proposed town centre, would likely reduce the employment densities in the town centre compared to previously envisaged in the Urbacity report and lessen the TOD proposition at Auranga Town Centre.

However, the level of economic performance of the proposed town centre is not reliant on the train station, as seen by the lack of retail around other train station stops across the Auckland rail network. The Auranga Town Centre is based on supporting the core Drury West catchment and no contingent on train passenger numbers to be viable. The Drury West market is driving the size and extent of the Auranga Town Centre, not the train station custom or location.

In my view the extent and type of the retail provision in the town centre would not be materially affected by the new train station location. If anything, it would only likely affect a few commercial or professional services activities who may no longer want to locate in the proposed



town centre. The centre's core market of Drury West is likely to be largely unaffected. Adverse implications for accessibility may be more impactful on civic and community uses which are likely to have a greater proportion of patronage derived from public transport infrastructure. This would dilute the vibrancy and vitality of the town centre (i.e., a social amenity impact), but likely have minimal impact on the economic performance of the centre in my view.

Alternatively, the Auranga Town Centre is not considered so reliant on the train station from an economic and employment perspective that if it were moved away from the centre, the viability of the entire centre falls away.

There are clear efficiencies in having a commercial centre and train station located together, particularly for employment opportunities and the ability to create a TOD. These opportunities have been reduced as a result of the train station migrating further west, but not lost altogether.

The train station, being less proximate, will have a weaker connection to the proposed town centre and its walkability to the town centre significantly reduced compared to the original location as assessed in the Urbacity report. However, if increased residential density resulted on the land in between the proposed town centre and the new train station location, then the number of people walking / biking to the centre for retail, commercial and professional services, community facilities and social connections may actually increase.

From an economic perspective, the proposed Auranga Town Centre is well positioned to take advantage of good accessibility and profile. Having direct profile and access from SH22 (via a connector road) is important for the centre. Proximity and profile to SH1 is not considered that relevant for the proposed town centre as the centre is designed to service the more localised Drury West market and not SH1 drive-by traffic.

In terms of the land area of the proposed Auranga Town Centre, Figure 10 and Table 9 of the Urbacity report is particularly relevant. At face value the 15.5ha commercial extent of the proposed town centre business zone is significant and well above what Property Economics had assessed as appropriate for a single centre in Drury West in its economic analysis on the Drury West area during the development of the Drury – Opaheke Structure Plan.

However, Table 9 breaks down the different elements of the proposed town centre with associated land areas. The first thing to note is that the commercial extent of the town centre's 15.5ha is only 7ha (core retail, parking and commercial). This is slightly less than what Property Economics recommended for a single Drury West centre back in its 2018 report for Council for the Drury-Opaheke Structure Plan. The 7ha commercial area is not of a scale that would go beyond usual trade competition effects nor generate any significant adverse retail distributional effects on other centres in Drury (West or East).

In essence the proposed town centre commercial areas reflect generally what Property Economics determined back in 2018, so I do not have any problem with the extent of the Auranga Town Centre as proposed. This however is on the basis that the identified non-



commercial areas could not be utilised for commercial activity, i.e., that the town centre is delivered in general accordance with Figure 10 (pg. 27) of the Urbacity report.

The balance of the proposed town centre is a lake (2ha), internal streets (4ha), housing (1ha), lake edge / urban square (1ha, and emergency services (0.5ha) - which combined add up to 8.5ha. These land areas are not included in Property Economics commercial (retail, office, commercial services) land area calculations, and they are not really developable. Essentially, the plan change proponent has included a lot of non-commercial land areas in the 15.5ha town centre business zone.

Submissions

There are three submissions relevant to economic matters. These are:

- Submission #28 – 415 Bremner Road Limited
- Submission #8 – Catholic Diocese of Auckland
- Submission #34 – Ministry of Housing and Urban Development (MHUD)

The Catholic Diocese and MHUD oppose the proposed Auranga Town Centre zone for a variety of reasons ranging from the train station's new western location (which separates the proposed centre and train station), and the loss of ability to create a TOD and likely lower employment densities. They indicate the proposed Auranga Town Centre being downgraded in status to a Local Centre to enable a town centre to be developed further west in closer proximity to the new train station location to generate all the employment and residential density benefits they outline in their submissions.

The Bremner Road Limited submission agrees with PPC51 as notified but includes a proviso (paragraph 7) regarding the location of the Drury West train station. In paragraph 9(b) the submission supports any amendments that may be sought by the applicant to address the new train station such as removing the Town Centre zone and decreasing the density of some of the proposed residential zones.

From an economic perspective the Drury West market can support a single new Town Centre zone in Drury West. The location of that zone is optimally combined with the train station to give the centre the best chance to maximise employment densities and link with the public transport initiatives (bus and rail) proposed. However, the lack of a direct train station connection does not render the proposed town centre unviable, but dilute the economic opportunity and benefits associated with it for the community.

Summary

Clearly, the new train station location has changed the economic dynamic, relative to that originally assessed by Urbacity, between the proposed Auranga Town Centre and the train station, and as such changed (diluted) the economic benefits outlined in the Urbacity report.



This is not a criticism of the Urbacity report, simply a result of timing with the new train station location being announced after the Urbacity report was completed.

The proposition of circa 8ha of commercially developable land for the Auranga Town Centre can be supported economically given the anticipated size of the future Drury West market. This support is for such a centre in Drury West. From an economic benefit perspective the location of the Auranga Town Centre being adjacent to the Drury West train station would likely generate increased economic benefits and efficiencies for the community, however being located separately dilutes rather than dismantles the potential economic benefits.

21 May 2021

To: Emily Buckingham, Consultant Planner, Auckland Council
From: Trent Sunich, Consultant Stormwater Technical Specialist

Subject: Private Plan Change – PPC51 Auranga B2, Auranga – Stormwater Assessment

1.0 Introduction

I have undertaken a review of the proposed private plan change, on behalf of Auckland Council in relation to stormwater management associated with the development of the precinct.

I hold a Bachelor of Technology (Environmental) which I obtained from the Unitec Institute of Technology in 2001. I have approximately 20 years' experience in the field of natural resource planning and environmental engineering. My expertise is in integrated catchment management planning, stormwater quality management, and assessing associated development related effects where previously I have held roles with the Auckland Regional Council and URS New Zealand Limited. I am currently employed by 4Sight Consulting as a Senior Environmental Consultant.

In writing this memo, I have reviewed the following documents:

- Drury-Opaheke Structure Plan Future Urban Zone, Draft Stormwater Management Plan, April 2019.
- Auranga B2 Private Plan Change Request Planning Assessment: Assessment of Environmental Effects.
- PC51 Request for Further Information and Appendices.
- Auranga B2 – Stormwater Management Plan. Rev C, dated 29/07/2020.

2.0 Key Stormwater Management Issues

The private plan change proposes the development of approximately 33 hectares of future urban zoned land to a Town Centre, Mixed Housing – Urban, and Terraced Housing Apartment Buildings zones. Land use in the proposed precinct area is currently rural type lifestyle properties.

As is described in the Stormwater Management Plan (SMP) accompanying the plan change application, the site is split into two distinct catchments. The central and north western portion of the plan change area is predominantly flat at approximately RL 15m. This portion of the catchment grades to the north, and eventually discharges into Stream A. This is called the 'Stream A Catchment'. The remainder of the site is gently rolling pastoral landform, dropping off to the estuarine riparian edge of Drury Creek to the south and east and an unnamed tributary stream of Ngakoroa Stream, immediately adjacent to State Highway 22 (SH22), to the south and east (the 'Ngakoroa Stream Catchment'). A 1.3ha ornamental lake (noted as Pond H in the SMP) is the main freshwater feature within the area. In low flow events, this pond discharges into a culvert under State Highway 22 (SH22), and then to the coastal headwaters of the Ngakoroa Stream. In high flow events when the culverts under SH22 are assumed to be blocked, overland flow runs along the northern embankment of SH22, and discharges into the Ngakoroa Stream. The pond receives flow from several permanent, intermittent and ephemeral streams and it is proposed to be enhanced as part of the Town Centre zone amenity.

The ultimate receiving environment for both sub catchments is the Drury Creek which is a Significant Ecological Area (SEA), Marine 1 and 2 as defined by the Auckland Unitary Plan Operative in Part (AUP(OP)).

The proposed change in land use will be to a predominantly urban environment with the corresponding development of impervious surfaces increasing stormwater runoff flow volumes and flow rates along with the generation of stormwater borne contaminants associated with urban land use being total suspended solids, metals and hydrocarbons.

The applicant has proposed a set of stormwater management related objectives and policies as follows. These are in addition to the existing AUP(OP) objectives and policies. While in some case there is no direct reference to stormwater management, there is alignment with the concept of integrated management by seeking to manage receiving environment adverse effects:

IX.2 Objectives:

- (4) *Establish the infrastructure necessary to service development within the Precinct in a coordinated and timely way.*
- (5) *Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.*

IX.3 Policies

Infrastructure

- (5) *Require subdivision and development to:*
 - (a) *Be sequenced Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades;*

Stormwater Management

- (6) *Require subdivision and development to:*
 - (a) *Be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation; and*
 - (b) *Incorporate enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature.*

IX.6 Standards

IX.6.3 Riparian Planting

- (1) *The Riparian margins of permanent or intermittent streams must be planted to a minimum width of 10m measured from the top of the bank, except where road or pedestrian crossings are required over streams.*

The proposed plan change is supported by a Stormwater Management Plan (SMP) which has been developed by the applicant's engineering consultant. SMP documents are required when development related stormwater infrastructure (e.g. stormwater pipes, outlets, treatment devices) is proposed to be vested as public assets with the Auckland Council. In most cases SMP documents also outline what form of stormwater mitigation will take place in private properties to support receiving environmental outcomes such as contaminant reduction, hydrology mitigation and flood hazard mitigation.

The Auckland Council's Healthy Waters department reviews each SMP document where the purpose is to have the document adopted under the Auckland Council's Stormwater Network Discharge Consent (NDC). The status of adoption means the stormwater mitigation proposed for the development aligns with the objectives and outcomes of the NDC and authorises future stormwater discharges under the NDC should the proposed plan change be approved. At the time of drafting this memorandum, Healthy Waters had reviewed the SMP document and had provided further comments for review by the applicant's engineering consultant.

Authorisation under the NDC is not mandatory where the alternative would be to seek stormwater discharge consents(s) through Chapter E8 of the AUP. However this would mean all stormwater infrastructure servicing the plan change area would remain privately owned and operated which is an unlikely scenario at this scale of development.

3.0 Applicant's assessment

In the SMP document and corresponding reporting in the plan change request's assessment of environmental effects, the applicant has outlined current and future site characteristics (e.g. topography, stream systems, site hydrology, flood plains), and in the context of the proposed land use types has detailed how adverse effects are proposed to be mitigated through selected stormwater methods that can be applied to a range of scenarios. The SMP has been developed in accordance with the Drury-Opaheke Structure Plan Future Urban Zone Stormwater Management Plan developed by the Auckland Council. The three main effects - contaminants management, hydrology mitigation and flood hazard management - are discussed as follows:

Stormwater Contaminants

As is indicated in the SMP document, an outcome of mana whenua consultation indicated a preference for the application of a treatment train approach for all impervious surfaces. As an example, for treatment of stormwater runoff from roads this means using a combination of oversized sumps, secondary communal devices, filter trenches/trench drains, swales, raingardens and tree pits, and green outlets. Where applicable all devices will be designed to comply with the Auckland Council's GD01¹ document. Prevention of the generation of contaminants (i.e. contaminant source control) is also included as an option in the SMP through the specification of inert roofing materials.

Hydrology Mitigation

The stormwater management response to this is firstly to reduce stormwater volumes discharging stream systems by promoting soakage to ground or non-potable rainwater harvesting, and secondly through stormwater detention which is holding and releasing stormwater flows at a controlled rate prior to discharge to stream. In the SMP document, the applicant has detailed the suite of stormwater devices which will assist in achieving hydrology mitigation outcomes for the plan change area across the differing zoning types. This includes bioretention devices such as raingardens, tree pits, vegetated swales, rainwater tanks and permeable paving.

Consistent with the commentary above regarding implementation of best practice, the applicant is proposing hydrology mitigation equivalent to Stormwater Management Flow Area 1 (SMAF 1) for the entire precinct. This is the more conservative of the two SMAF types stipulated in the AUP thereby managing a detention volume for the 95th percentile rainfall event. The inclusion of the SMAF 1 overlay through the plan change area will also trigger future land use consents under the E10 rule set of the AUP.

Hydrology mitigation equivalent to SMAF 1 is proposed to be applied to the 'Stream A Catchment' sub catchment. Hydrology mitigation is also proposed for the Ngakoroa Stream catchment and the SMP has indicated that as development progresses and final contours are determined, some stormwater discharges may be to the tidal sections of the Ngakoroa Stream (i.e. below 1.7m RL). Therefore as is defined by the Rules in Chapter E10, hydrology mitigation is not required to be applied in those cases.

Flood Hazards

As is summarised in the SMP document, the proposed precinct area is identified on the Auckland Council's GIS mapping system as currently being subject to overland flow paths and flood plains with this information derived from Rapid Hazard Mapping of the Auckland Region undertaken in 2009.

In order to assess post development flood hazard effects, an updated flood hazard assessment based on improved modelling has been undertaken specifically for the Auranga A and B catchment by Tonkin and Taylor and includes maximum probable development (MPD), climate change, 1% AEP² rain event with mean high-water springs (MHWS) and 1 m sea level rise (3.1 mRL).

In summary, the proposed development of the Auranga B2 plan change area does not change the flood hazard to buildings/dwellings in the area, or downstream of it. Therefore, the focus of

¹ Stormwater Management Devices in the Auckland Region December 2017 Guideline Document 2017/001

² Annual Exceedance Probability

flood management is to protect new development from the future flood hazard by implementing the following:

- No residential development within the 1% AEP floodplain;
- No building development within riparian margins;
- Existing overland flow paths will be re-diverted and accommodated by recontouring as part of the development; and
- Overland flow paths up to the 1% AEP event will be provided within the road carriageways, verges and other defined pathways i.e. in open space reserves.

As is indicated in the SMP, several options are presented in relation to flow management from the artificial pond sub catchment that currently flows through a culvert beneath SH22. Options for future management of flow from this sub catchment will be determined in due course to coincide with the proposed upgrade to SH22 (four laning), including the provision for temporary peak flow attenuation if required.

Plan Change Area Objectives and Policies

The infrastructure management related plan change objectives and policies generally relate to the suitable provision of infrastructure including that is precede subdivision and development and be sequenced (Objective IX.2(4) and Policy IX.3(5a)). Specific stormwater policies relate to consistency with any network discharge consent and stormwater management plan, (Policy IX.3(6a)) and the incorporation of riparian planting, including of the ornamental pond.

4.0 Assessment of stormwater effects and management methods

In the Auckland Unitary Plan (Operative in Part) (the AUP), the stormwater management objectives and policies are detailed in Chapters B7, E1 and E36. Consistent themes throughout the objective and policy frameworks relate to minimising the discharge of contaminants and adverse effects on freshwater and coastal receiving environments. Consistent with the NPSFM 2020 the E1 chapter also details stormwater management policies and introduces the integrated stormwater management approach seeking retention of natural hydrological features, reduction of stormwater flows and contaminants and land use integration to minimise adverse effects on receiving environments. Minimisation of flood hazard, including floodplains and overland flow paths during subdivision use and development is managed through the E36 objective, policy and rule set.

In accordance with current practice for the management of stormwater runoff associated with green field development in the Auckland Region, the applicant has developed an SMP document to provide a road map for the construction and operation of a reticulated stormwater system responding to receiving environment attributes with a suite devices and methods to be designed in accordance with best practice stipulated in GD01. In summary this is:

- Water quality treatment of contaminant generating impervious surfaces (e.g. roads, car parks, access ways) including the implementation of a three-train treatment approach and the specification of inert roof materials (i.e. contaminant source control).
- Hydrology mitigation to manage post development stormwater volumes seeking to minimise stream bank erosion for Stream A Catchment. This complements the ecological benefits provided by riparian enhancement such as stream bank stabilisation and shading; and
- Post development management of flood hazard risk such as avoiding development in floodplains and optimising pre and post development overland flow paths.

In reviewing the applicable objectives and policies in the regional policy statement and regional plan of the AUP, the proposed stormwater management methodology outlined in the SMP document and the objectives and policies in the proposed plan change, overall at a high level there is alignment is seeking to achieve suitable receiving environment outcomes associated with the development. In brief there are:

- Proposed integrated management of land use and freshwater systems by providing stormwater infrastructure implemented with assistance of catchment planning (B7.3);
- Minimisation of the generation and discharge of contaminants in stormwater runoff through the proposed use of contaminant source control and water quality treatment devices (B7.4);

- Implementation of hydrology mitigation to minimise or mitigate new adverse effects associated with stormwater running off impervious surfaces (E1(9)); and
- Through catchment and development-based flood hazard modelling, avoidance of exacerbation of existing flood risk (E1(11)).

It is noted future stormwater diversions associated with the development would be permitted activities under Chapter E8 (A1) providing the development demonstrates compliance with the SMP document. Other land use stormwater rule chapters in the AUP being E9 (Stormwater quality - High contaminant generating car parks and high use roads) and E10 (Stormwater management area - Flow 1 and Flow 2) any associated land use consent requirements will still apply.

5.0 Submissions

Assessment of stormwater management related submissions and further submissions is as follows:

33 Ngāti Te Ata Waiohua

Submission

Wai (Water): PPC51 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC48's proposed treatment of waterways and its proposed stormwater and wastewater solutions.

Relief sought:

- (g) A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway;
- (h) Roof capture for reuse and groundwater recharge;

Assessment

There is merit in specifying a treatment train approach as this aligns with best practice with regard to the reduction of contaminants entrained in stormwater runoff. As is discussed above, the SMP document proposes a three-train treatment approach with all devices designed in accordance with GD01.

Roof water capture and/or groundwater recharge is discussed in the SMP and is a requirement in implementing the E10 Stormwater Management Area Flow rule set in the AUP. This will be applied to sites that fall within the Stream A Catchment consistent with AUP hydrology mitigation requirements.

35 Auckland Council

Submission

An amendment is requested to Objective IX.2(5) to better reflect the policy direction in AUP E1 for greenfield developments to avoid adverse effects as far as practicable or otherwise remedy or mitigate effects. It would also better reflect the hierarchy of principles for freshwater management in the NPS-FM to place the health of streams and wetlands as the first priority ahead of other uses and values.

Relief sought:

Amend Objective IX.2(5) to read:

Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.

Assessment

The additional text in this submission is redundant in my opinion given development at any scale typically is not able to avoid adverse effects. I recommend this submission be rejected.

Submission

Stormwater management area flow 1 (SMAF 1) as proposed in PC 51, is a control which provides a framework for hydrology mitigation where there will be discharges into a stream environment. SMAF 1 has both a retention and detention volume and the combination of these is intended to reduce erosive flows in streams, maintain stream baseflow and support the recharge of aquifers. It is the default minimum required under the region wide Network Discharge Consent (NDC) granted by the Environment Court on 30 October 2019 and based on current knowledge is the most practicable option in most catchments. However, the Drury 2 southern sub-catchment discharges to the Ngakoroa Stream at a point which is still tidally influenced (though not identified as CMA on AUP maps). Consequently, application of SMAF 1 over the entire precinct may not be the most efficient or effective option.

Relief Sought:

1. Retain application of SMAF 1 to the entire plan change area, or
2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or
3. Mark on the precinct plan where the SMAF 1 control applies, or
4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct.

Assessment

The applicant has conservatively applied the SMAF 1 overlay over the entire precinct noting the future discharge points to the receiving environment (including the tidal reaches of the Ngakoroa Stream) will be determined during later design processes. At that time any discharges directly to the tidal receiving environment (below RL 1.7m) will be a permitted activity under E10 (A1) and will not require hydrological mitigation. Therefore, I recommend the SMAF 1 overlay be retained.

Submission

Policy IX.3 (6)(a) is supported but this needs to be supported by rules in the precinct so that the policy applies for all subdivision and development activities.

Relief Sought:

Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read:

- (1) Activities and subdivision must comply with the Drury X Precinct Plan.

Assessment

I agree with this submission as the standard refers to the activity table IX.4.1 which encompasses activities and subdivision.

Submission

New policies are requested to protect the receiving environment of the Te-Manukanuka-O-Hoturoa (Manukau Harbour).

Additional policies are required to achieve the stormwater outcomes that are outlined in the SMP and required by the AUP. Some Auckland-wide rules adequately address some aspects of stormwater management (such as SMAF) but there are significant gaps particularly with regard to water quality.

These policies guide resource consent processing.

Relief Sought:

Insert new policies to the following effect:

- Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.
- Require on-site management, or for higher density development private communal management of stormwater runoff from impervious areas.
- Reduce contaminants at source through the use of inert building materials and treatment at source where possible.
- Provide hydrology mitigation through retention, near source or communal detention to manage effects on streams.
- Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.
- Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects.

Assessment

I recommend rejecting this submission as these matters are adequately addressed in the SMP document and through the associated authorisation processes of the Auckland Stormwater NDC implemented by Healthy Waters.

Submission

Unlike PC 48 – PC 50, no stormwater quality standard is proposed in PC 51. A standard for stormwater quality treatment is proposed to protect the upper Te- Manukanuka-O-Hoturoa (Manukau Harbour) from contaminant accumulation from the combined contaminant discharges from all impervious surfaces including roads. This gives effect to the RPS B7.3 objectives and policies relating to freshwater systems, RPS B7.4 objectives and policies relating to coastal water and freshwater, the NPS-FM and the New Zealand Coastal Policy Statement 2010. The council would like to work with the applicant and other interested parties on the detail of the standard.

Relief Sought:

Include a new standard to provide for stormwater quality treatment.

Assessment

The stormwater quality treatment expectations for the precinct are outlined in the SMP with reference to that document through Policy IX.3(6)(a). I recommend this submission be rejected.

Submission

The receiving environments downstream of the plan change sites are highly sensitive to additional contaminants and are Significant Ecological Areas (SEAs). The NPS-FM requires that the health of freshwater receiving environments is prioritised above other uses and needs. This and other existing AUP objectives and policies direct that freshwater quality is maintained where it is good and enhanced where degraded. The existing provisions do not go far enough to achieve this. The SMP notes a mix of methods will be used including treatment of roads and use of inert building materials.

A new standard relating to the exterior materials on buildings is requested.

Relief Sought:

Include a new standard to the effect that:

Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.

Assessment

I agree with the intent of the drafting of this standard and a similar outcome is sought in the SMP. As discussed earlier, care should be taken in drafting the standard so as not to unintentionally

exclude building products which are demonstrated to have inert qualities (e.g. zinc aluminum coated roofing and cladding materials).

37 Elly S Pan

Relief Sought:

That the plan include provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 22, water, wastewater, stormwater and other methods of transport.

Assessment

I recommend this submission be rejected in part in relation to the inclusion of stormwater in the provision. The SMP document acknowledges the potential capacity constraint of the culvert beneath SH 22 and has proposed temporary peak flow attenuation to match pre development flow rates if required.

44 Ngati Tamaoho Trust

Relief Sought:

The Submitter requests a decision on PPC51 that confirms the following, at a minimum:

- (g) A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.
- (h) Roof capture for reuse and groundwater recharge.

Assessment

See assessment above regarding the Ngāti Te Ata Waiohū submission.

6.0 Conclusions and recommendations

The applicant is proposing to develop a new precinct comprising Town Centre, Mixed Housing – Urban, and Terraced Housing Apartment Buildings zones resulting in the large-scale creation of impervious surfaces with associated stormwater related effects (flow/volume, contaminants, flood hazard) requiring management and mitigation with a supporting new stormwater network.

In order to support the proposed development and enable future construction and operation of the associated stormwater network, a SMP accompanies the plan change application with associated stormwater related objectives and policies in the proposed precinct chapter. Broadly the two documents align with the stormwater related objectives and policies in the regional policy statement and the regional plan requirements stipulated in E1. The E1 objective and policies regarding implementation of integrated management frame Stormwater NDC requirements and adoption of the SMP by Healthy Waters where demonstration of consistency with E1 is a certification requirement stipulated in Schedule 4 of the NDC. At the time of writing this memorandum, the SMP was being reviewed by Healthy Waters.

Various submissions have raised additions and deletions to the precinct objectives and policies and my recommendations to adopt or reject the relief sought are discussed in the section above. It is noted the edits and new additions are aimed at strengthening the existing objective and policy framework and associated implementation of the SMP and it is unlikely significant adverse effects would result if the matters are not addressed. The recommended changes are summarised as follows:

Additions are underlined, deletions are ~~strikethrough~~.

Standard IX.6.1:

- (1) Activities and subdivision must comply with the Drury X Precinct Plan.

New Standard:

Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.

Taking these matters into account, my recommendation is to support the proposed plan change and stormwater related objectives and policies.

19 January 2021

To: Emily Buckingham, Consultant Planner, Hill Young Cooper
From: Connor Whiteley - Specialist – Freshwater Ecology (Specialist Unit, Resource Consents), Auckland Council

Subject: Private Plan Change – PC51 Precinct, Drury – Freshwater Ecology Assessment

1.0 Introduction

1.1 I have undertaken a review, on behalf of Auckland Council in relation to potential freshwater ecology effects associated with the above proposed private plan change.

I am employed by Auckland Council as a Specialist - Freshwater Ecology in the Earth, Streams and Trees team, Specialist Unit, Resource Consents. I have held this role since 14/10/19. Prior to this, I was a Senior Ecologist at the consultancy Ecology New Zealand leading the freshwater ecology discipline. I have extensive experience within the ecological field and have specialised in freshwater ecology over my +8 years' experience.

1.2 In writing this memo, I have reviewed the following documents:

- *'Auranga B2 Private Plan Change Request, Planning Assessment: Assessment of Environmental Effects'*, prepared by Tollemache, dated May 2020.
- *'Auranga B2 Private Plan Change, Drury, Ecological Values Assessment'*, prepared by RMA Ecology, dated April 2020.
- *'Plan Change B2 Bremner Road, Drury, Precinct Plan'*, prepared by McKenzie & Co Consultants, dated 28 February 2020.
- *'Auranga B2 Private Plan Change Request, Planning Assessment: Section 32 Assessment'*, prepared by Tollemache, dated May 2020.
- *'PPC Application – Clause 23 Response'*, prepared by Tollemache, dated 26 June 2020.
- *'Drury – Opāheke Structure Plan August 2019'*, prepared by Auckland Council, dated August 2019.

2.0 Key Freshwater Issues

In summary, the plan change does not propose precinct-specific rules, assessment criteria and matters of discretion in relation to freshwater works. The applicant has proposed that all works associated with future development will be suitably addressed by Chapter E3 (Lakes Rivers Streams and Wetlands) of the AUP OP. They have proposed that no further rules are considered to be necessary to manage actual or potential effects. I agree that, provided the rules of the NES and Chapter E3 are correctly applied, that no further rules are necessary.

The applicant has considered the application in regard to the National Policy Statement for Freshwater Management 2014. Since the submission of the application the central government has released the National Policy Statement for Freshwater Management 2020 (NPS:FM 2020) and the National Environment Standards for Freshwater 2020 (NES F 2020) which afford a higher protection to New Zealand's freshwater ecosystems. The advent of the NES F 2020 is resulting in the revision of the AUP OP to give effect to the new rules and change in direction on how to manage freshwater under the Resource Management Act 1991. This revision will update Chapter E3 (which the precinct proposes to apply), and the NES F 2020 will apply to future resource consents, so no changes are required to the precinct to address the NPS:FM 2020 or the NES F 2020.

The applicant has identified a number of waterways within the catchment, although did not identify every watercourse. However, the ecology report has recommended that the structure plan should identify the streams and wetlands as constraints in the analysis of the features of the PPC area but then admits that the stream classifications in some cases are indicative given the limitations. There is a concern that should the current identified freshwater ecosystems be

included within the precinct plan, any future classification will utilise the current limited classification system and thus will reduce the accuracy of any further assessment of the freshwater ecosystems. A full and accurate assessment should be provided and streams identified on the precinct plan or that the mapping and protection of all freshwater features is left until the resource consent stage.

3.0 Applicant's assessment

The applicant's ecologist undertook a desktop assessment, reviewing current ecologically significant areas, as defined within the AUP OP and additionally within the Legacy District and Regional Plans for any previous ecologically significant areas. Auckland Council GIS was reviewed to identify existing vegetation, streams and overland flow paths. Additionally, the New Zealand Freshwater Fish Database and the NIWA Freshwater Biodiversity Database were consulted to identify if any threatened species have been recorded within the freshwater environment.

Field assessment were carried out across multiple days (? & 10 February 2017, 21 June 2017 and 28 March 2019). During these days waterways were mapped and classified. One stream was assessed using the Stream Ecological Valuation (SEV) methodology on the 9 February 2017.

The assessment undertaken by the applicant ecologist has mapped and classified some of the aquatic features throughout the site yet has not fully ground truthed and/or classified all of the aquatic features and has documented that this will be undertaken at a resource consent stage. The applicant has documented that the current ecological values of the freshwater features within the proposed precinct are considered to be low to moderate.

The applicant has proposed to include a standard (standard IX.6.4(2)) within the proposed precinct that provides that all streams (permanent and intermittent) and wetlands have a 10m riparian margin planted. The applicant's ecologist has assessed that these rules are considered to be appropriate to manage the potential effects of residential development within the site.

In summary, I agree with the methodologies presented by the applicant's ecologist, however, I have concerns to the extent of the information generated by the methodologies. If the applicant is seeking to identify and map all freshwater features, then a full comprehensive mapping and classification of all freshwater ecosystem should have been undertaken. I would therefore recommend that comprehensive and detailed mapping of the freshwater features is included within the precinct plan and that all freshwater mapping and classification is further clarified at the resource consent stage.

The assessment reaches a conclusion on the current ecological values of the freshwater features within the proposed precinct but does not consider the new NPS:FM 2020 and the NES F 2020 and is therefore not complete in respect to these two documents. I do however, agree that if the freshwater features are managed through the current Chapter E3 rules within the AUP OP, the new rules within the NES F 2020, the objective and policies within the NPS:FM 2020 and the proposed standards within the precinct, all effects associated within the development can be managed accordingly. I would seek that the riparian margins required by standard IX.6.4(2) be upgraded to include 20m of riparian planting along either side of all permanent streams to provide for the protection and improvement of instream aquatic values as mentioned within Riparian Management Guidelines (TP148) the planting of intermittent streams may remain at 10m. The restoration of 20 m riparian margins for permanent streams and 10 m riparian margins for intermittent streams, and their protection in perpetuity align with RPS Objectives B7.2.1(2), B7.3.1(1) and B7.3.1(3).

The riparian planting would need to be protected for the long term. A suitable mechanism needs to be in place where the riparian area remains within private land.

Walkways and cycleways could occupy part of the 20m riparian zone where part of a reserve or open space area, otherwise footpaths car parking area and carriageways associated with road reserves would need to be outside the 20m wide strip.

4.0 Submissions

Submissions 15, 21, 22 and 35 make specific reference to concerns regarding freshwater ecology. The points raised by the submitters vary, with majority of submitters raising concerns in relation to effects on the freshwater ecology with one submitter proposing changes to the current precinct proposal to facilitate stream reclamation for the development of Drury Boulevard.

Submission 33 is from Ngāti Te Ata Waiohua and submission 44 is from Ngāti Tamaoho contend that PPC51 is inconsistent with Part 2 of the RMA, specifically Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development. They have furthermore documented that PPC51 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the proposed precinct plan. To address their concerns that they have raised they have suggested a minimum of 20 metre riparian margin for all waterways (especially those to contain walkways / cycleways).

In general, I agree with the responses submitted by both Ngāti Te Ata Waiohua and Ngāti Tamaoho as I agree PPC51 is inconsistent with the RMA NPS-FM 2020 and AUP (OP) in relation to the preservation of wetlands lakes and rivers and their margins and agree that a minimum of 20 m riparian margin for all waterbodies and permanent streams would be preferred.

Submission 35 is made by Auckland Council and makes specific reference to concerns regarding the freshwater environment. Specifically, the applicant has indicated that the precinct is not fully consistent with the objectives and policies of the NPS:FM 2020. Auckland Council is seeking that more policies and rules are incorporated to give full effect to the direction of the NPS FM 2020, including but not limited to Te Mana o te Wai. Finally, Auckland Council seeks a map of all permanent and intermittent streams and wetlands is included in the precinct plan.

In general, I agree with the submission by Auckland Council given that it highlights the concerns that have raised within this technical report. One difference is that given the applicant has not extensively and comprehensively assessed all of their freshwater features (both classified streams and wetlands) I do not agree that including a map based on the current information provided by the applicant would sufficiently protect the true extent of the freshwater features within the site. Therefore, I would either recommend that the mapping and protection of all freshwater features is left until the resource consent stage or that a comprehensive mapping and identification exercise is undertaken immediately.

5.0 Conclusions and recommendations

In general, I am in full supportive of the proposal to seek that all matters pertaining to streamworks will be managed under the AUP OP Chapter E3 and thus will manage any effects that may be associated with any future development.

The current application documents do not acknowledge the newly released NPS:FM 2020 and NES F 2020, but objective 1 and policies 1 – 15 of the NPS:FM 2020 will apply to the precinct via the Auckland wide sections of the AUP and the NES F 2020 rules will apply to future resource consents. This will allow for the precinct to be managed in accordance with the NPS:FM 2020, the NES F 2020 and the AUP OP and thus effectively manage the effects on the freshwater environment associated with development. The application of the NPS FM will further satisfy the concerns raised by submitters 33, 35 and 44.

In summary, I can support the proposed plan change from a freshwater ecology perspective if the modifications to riparian planting standards are undertaken as identified in the points above, and if a comprehensive freshwater mapping and identification exercise is undertaken before development. If the modifications are not made, I believe that the Private Plan Change **PC51** will be inconsistent with and not give effect to the objective and policies within the NPS FM 2020 which gives strong national-level direction to the protection of our freshwater environment and will not meet the goals of Te Mana o te Wai or the applicable objectives and policies of the AUP (OP).

REVIEW

Memo prepared by:

Connor Whiteley



Specialist - Earth and Stream works, Earth, Streams and Trees Team, Specialist Unit, Resource Consents

Date:

19 January 2021

Technical memo reviewed and approved for release by:

David Hampson



Team leader - Earth, Streams and Trees Team, Specialist Unit, Resource Consents

Date:

7 April 2021

29/07/2021

To: Emily Buckingham, Planner
From: Carl Tutt, Ecologist, Auckland Council

Subject: Private Plan Change 51 – Karaka and Drury Limited – Terrestrial Ecology Assessment

1.0 Introduction

1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to terrestrial ecology effects.

1.1.1 I hold the qualifications of Bachelor of Science in Biology and Post Graduate Diploma in Environmental Management from Auckland. I have 8 years' experience working as an ecologist in private and local government sectors.

1.1.2 I have completed the Auckland Council Stream Ecological Valuation (SEV) training (2015).

1.1.3 I am a professional member of the New Zealand Ecological Society, Environment Institute of Australia and New Zealand, New Zealand Freshwater Sciences Society and New Zealand Herpetological Society.

1.2 In writing this memo, I have reviewed the following documents:

- Planning Assessment: Assessment of Environmental Effects, by Tollemache Consultants Ltd, dated May 2020. (hereafter referred to as the 'planning report')
- Planning Assessment: Section 32 Assessment, by Tollemache Consultants Ltd, dated May 2020.
- Landscape and Visual Effects Assessment, by LA4 Landscape Architects, dated 17 April 2020.
- Appendix 1: Section 32 Evaluation of Proposed Rules and Methods (S32(2)) Proposed Provisions to Achieve Objective(s).
- Ecological Values Assessment, by RMA Ecology, dated April 2020. (hereafter referred to as the 'ecological report')
- Auranga B2 Stormwater Management Plan, by McKenzie & Co, dated April 2020.

1.3 The applicant has prepared a Precinct Plan, including planning maps as part of the application material.

1.4 I have also reviewed the Drury-Opaheke Structure plan prepared by Auckland Council, dated August 2019

1.5 I undertook a site visit on 10th June 2020.

2.0 Key Terrestrial Ecological Issues

2.1 Consideration of habitat for bats

The ecological report has assessed habitat quality on site in relation to avifauna (birds) and herpetofauna (lizards), however, bats have been notably excluded despite the presence of potential roost trees on site and nearby bat records.

2.2 Proposed plan wording

Policy IX.3 (6)(b) falls short in stating incorporate enhancement planting. This policy should be more holistic and include specific reference to biodiversity enhancement planting as this is the key outcome of the riparian restoration and seeks to achieve better outcomes.

Standard IX.6.3 states “any wetland, permanent or intermittent stream and the Ngakoroa Stream”. It is unknown why the Ngakoroa Stream is specifically mentioned in this standard when it is applicable to any stream. Additionally, this stream would likely be subject to esplanade provisions at future subdivision stages. Reference to the Ngakoroa Stream should be removed unless there are different provisions relating to the Ngakoroa Stream i.e. 20m minimum riparian margins as opposed to 10m minimum.

Standards associated with riparian planting (IX.6.3) could go further to include additional points in relation to local fauna values and ongoing management of the restored areas. This is in line with the desired outcomes of the Drury-Opaheke Structure plan, specifically the desired outcome stating retention or creation of areas of rank grass or low growing native vegetation to provide habitat structure for native skinks. Note that rank grass is an example, coarse woody debris or eco-stacks could be incorporated into the riparian areas to provide refugia while maintaining the desired amenity/outlook. This standard could be further expanded to incorporate wider fauna values such as planting flowering and fruiting species to attract birds.

3.0 Applicant’s assessment

- 3.1 The assessment of terrestrial values and effects was based on both a desktop assessment and site visit for the plan change area as presented in figure 2 of the ecology report.
- 3.2 The ecology report describes the terrestrial environments within the proposed plan change boundaries; Sections 3.6 and 3.7 of the ecology report.
- 3.3 The ecological report assessment details the flora and fauna of the site. This is largely adequate; however, bats have been notably excluded from the assessment. This is despite there being trees of sufficient age and size to provide bat roosting habitat and verified bat records within 6km of the site.
- 3.4 The ecology report concludes that E15 is appropriate to address the potential effects generated at time of resource consent.

4.0 Assessment of terrestrial ecology effects and management methods

- 4.1 Objective B7.2.1(2) of the Regional Policy Statement seeks that *Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.*
- 4.2 AUP Objective E15.2.(1) seeks that *Ecosystem services and indigenous biological diversity values, particularly in sensitive environments, and areas of contiguous indigenous vegetation cover, are maintained or enhanced while providing for appropriate subdivision, use and development.*
- 4.3 Objective E15.2(2) also seeks that *Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.*
- 4.4 I consider that currently the plan change is partially inconsistent with these objectives as set out below.
- 4.5 The exclusion of bats from the ecological assessment is inadequate. The presence of potential roost trees on site and records within 6km of the site indicates that some consideration is required. The long-tailed bat (*Chalinolobus tuberculatus*) has a conservation status of ‘Threatened—Nationally Critical’. It is protected under the Wildlife Act 1953 and their habitat requires consideration as a matter of national importance under section 6(c) of the RMA. As bats are highly mobile species with large home ranges (100km²) their habitat can occur anywhere in the landscape. Some of the older, larger trees on site outside of riparian margins and significant ecological area overlays contain flaking bark and/or roost cavities that would be suitable day roosts for bats.
- 4.6 I only concur that E15 is appropriate to address the potential effects generated at time of resource consent in relation to any trees within riparian margins. Some of the potential bat roost trees are outside of riparian margins. With an urban zoning applied to the land there

is no protection afforded to the trees outside riparian margins under E15 or the subdivision rules in E38. Therefore, under the current provisions there is no surety these trees will be considered at resource consent stage. I consider this is inappropriate for the management of a threatened species.

- 4.7 It should also be noted that New Zealand Dabchick (*Poliocephalus rufopectus*), an at risk – recovering species has recently been identified at the pond at 6 Burberry Road. Further assessment at the development stage would be required to determine the effects of the development on this species along with any mitigation measures (habitat retention and enhancement, lighting restrictions etc) to ensure that the species can continue to successfully utilise the onsite habitat.
- 4.8 To address this issue, in the absence of sufficient assessment of bats in the applicant's ecology report, I recommend the addition of a new standard requiring the ecological surveys of bats, birds and lizards as part of any subdivision. This will help ensure that all ecological values are appropriately considered at the outset of development. Suggested new wording has been provided in section 6.0 below
- 4.9 To help achieve biodiversity enhancement objectives I recommend Policy IX.3 (6)(b) should be amended as follows: Incorporate biodiversity enhancement planting of riparian margins of streams, wetlands (including the Ngakōroa Stream) and the lake feature.
- 4.10 The modification of standard IX.6.3 is required to create a more defined link between policy (6)(b), providing for better ecological outcomes. Suggested new wording has been provided in section 6.0 below. In summary these changes seek to create more ecologically resilient areas benefiting all flora and fauna, specifically an average of 20m riparian margins on permanent streams, wetlands and the lake feature; and 10m minimum riparian margins on intermittent streams.
- 4.11 The inclusion of a standard specifying the enhancement or creation of habitat for threatened species within the riparian margins such as that suggested in section 6 below will provide a more holistic approach to biodiversity management across the site and be consistent with the objectives in AUP B7.2.1(2) and E15.2(2) and Te Mana o Te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020.

5.0 Submissions

- 5.1 I have read the submissions for PC51. Five submitters expressed concern relating to the terrestrial ecology of the site. They are numbers 33 (Ngāti Te Ata Waiohua), 35 (Auckland Council), 41 (Heritage New Zealand Pouhere Taonga), 43 (Kāinga Ora Homes and Communities) and 44 (Ngati Tamaoho Trust).
- 5.2 Submission 33 makes specific note of the use of native trees and plants within the precinct. I support this approach. Section IX.6.3 (2) specifies the use of eco-sourced native vegetation consistent with local biodiversity for all riparian margins. For all other trees within the precinct (street and amenity trees) it is preferential to also use native species.
- 5.3 Submission 35 makes specific reference to policy IX.3 (6)(b) to incorporate biodiversity enhancement to assist in ensuring good outcomes. This submission also recommends changes to standard IX.6.3 by including reference to AUP Appendix 15.6(3) (b-f) and (4). I support these amendments in part, as they are similar to amendments that I have also recommended.
- 5.4 Submission 41, while not specifically raising biodiversity issues, does comment on riparian margin planting in relation to archaeological sites. This can be incorporated into restoration plans for the site through appropriate species selection such as avoiding deep rooting species in sensitive archaeological areas.
- 5.5 Submission 43 seeks an amendment to IX.6.3 (2). I agree that the standard should be reworded to clarify that a planting plan is required and consider this is appropriately addressed by the reporting planner.
- 5.6 Submission 44 makes specific note of the use of native trees and plants within the precinct, same as submission 33 which I support. This submission also seeks a minimum of 20m

riparian margin for all waterways. The proposed plan change seeks 10m minimum riparian margins on each bank. It is unclear if this submission is seeking 20m on each bank or a 20m vegetated riparian strip. These riparian margin minimum widths should be the vegetated width, with any walkways/cycle ways additional to the minimum width. I support the riparian margin widths specified being the vegetated widths. Any walkways/cycleways need to be additional to this width.

6.0 Conclusions and recommendations

- The applicant has not adequately addressed the private plan change's effects on the environment related to ecology. Notably potential impacts on bats. The AUP:OP is not absolute when protecting habitats of indigenous fauna. Some of these habitats fall outside of riparian margins and significant ecological areas especially when considering species which have large home ranges or utilise different environments at different life stages. The AUP envisages detailed assessments of future growth areas through the plan change process would identify any significant habitat of indigenous fauna that needs protecting under section 6(c) of the RMA, and B7.2 of the RPS. Case 2020_NZEnvC_189 involved long tailed bats and the management measures in place to protect them in a known location. It acknowledges the large home range of bats and the emphasis on improving habitat quality of critical species. Given there are known populations nearby this site then any ecological impact assessment needs to consider effects on this species.
- The remainder of the private plan change is generally consistent with the direction and framework of the AUP. Amendments to include specific reference to biodiversity enhancement will bring the proposed precinct more in line with the requirements of the Regional Policy Statement B7.2.
- The private plan change is partially inconsistent with some of the key ecological opportunities identified in the Drury-Opaheke Structure plan specifically in relation to fauna values. The PPC, also lacks consistency with Te Mana o Te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 and the Auckland Indigenous Biodiversity Strategy. This PPC falls short by only providing a focus on enhancement planting not specifying biodiversity enhancement planting which would assist in ensuring better outcomes for biodiversity.
- Not enough information has been provided to support the current wording of the plan change. Current information gaps are able to be addressed at the development stage provided the following modifications are adopted.
- I am able to support the plan change with the following modifications. Underlined text are additions, ~~strikethrough~~ text are deletions.

Policy IX.3 (6)(b)

- Policy IX.3 (6)(b) - Incorporate biodiversity enhancement planting of riparian margins of streams, wetlands, ~~(including the Ngakeroa Stream)~~ and the lake feature.

IX.6.3 Riparian Planting

1. The riparian margins of any wetland and the lake feature must be planted to an average width of 20m. ~~All permanent and intermittent streams and the Ngakeroa Stream~~ must be planted to a minimum width of 10m. All riparian widths are measured from the top of the stream bank, except where road or pedestrian crossings are required over streams.
2. The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) must:
 - a. Incorporate all information requirements of AUP:OP Appendix 16 ~~include a plan identifying the location, species, planting bag size and density of the plants;~~
 - b. be prepared and confirmed by a suitably qualified and experienced person ~~by a use eco-sourced native vegetation where available;~~

- c. ~~be consistent with local biodiversity;~~ provide fruiting and flowering plants for birds and suitable habitat structure for lizards;
- d. be planted at a density of 10,000 plants per hectare, unless a different density has been approved on the basis of plant requirements.

IX.6.5 – New standard

- As part of any subdivision application an Ecological Management Plan containing ecological surveys of bats, birds and lizards, shall be undertaken, and existing significant ecological values and habitat features identified and protected from development.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

25 March 2021

To: Emily Buckingham, Consultant Planner on behalf of Auckland Council
From: Robin Rawson, Xyst Ltd, Parks Planner on behalf of Auckland Council

Subject: Private Plan Change – PC51 Auranga B2 Precinct, Drury – Parks Planning Assessment

1.0 Introduction

- 1.1 I have reviewed private plan change PC51 on behalf of Auckland Council in relation to the planning of open space for future residents and Parks, Sport and Recreation effects.
- 1.2 I am a registered landscape architect, and my qualifications include a Bachelor of Landscape Architecture with Honours from Lincoln University, and a Bachelor of Science from Auckland University. My experience in parks and recreation planning includes seven years working within the Manukau City Council Parks Department as a Parks Officer and Landscape Architect, and seven years working as a Planner within the Infrastructure Department at Whangarei District Council where work for the Council Parks Department was a larger part of the role.
- 1.3 In writing this memo, I have reviewed the following documents from the Auranga B2 Private Plan Change application:
 - Section 32 Analysis / AEE
 - Proposed Auranga B2 Text
 - Proposed Precinct Plan
 - Urban design assessment and neighbourhood design statement and Attachments
 - Clause 23 Response.
- 1.4 I undertook a site visit to existing public spaces within and around the periphery of the site on 18 January 2021, including roads, the river mouth edge and the Drury sports fields.
- 1.5 Auckland Council non-regulatory documents supporting the Auckland Regional Policy Statement referred to in this report include:
 - Drury-Opāheke Structure Plan 2019
 - Open Space Provision Policy 2016
 - Parks and Open Space Acquisition Policy 2013
 - Southern Structure Plan Area Neighbourhood Design Statement (Revision B Drury-Opāheke and Pukekohe-Paerata) 2019
 - Drury-Opāheke Structure Plan Parks and open space report March 2019.

2.0 Key Parks, Sport and Recreation Issues

General

- 2.1 This assessment covers the open space provisions of the precinct plan and the development of any open space areas that may be vested in Council.
- 2.2 Objective B2.7.1. (1) of the Auckland Regional Policy Statement directs that: 'Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities'. The Regional Policy Statement includes policies requiring that a range of open spaces are provided in locations that are accessible to people and communities, and the urban subdivision section of the Auckland Unitary Plan (AUP) includes policies requiring that subdivision provides open spaces for the recreation and amenity needs of residents that are in proportion to the future density of the neighbourhood.
- 2.3 No open space analysis was provided with the application. Open space land proposed to be vested with Council consists of esplanade reserve on the harbour edge.

- 2.4 The Drury Opāheke Structure Plan includes a 'Blue-Green Network Map' that identifies an indicative distribution of neighbourhood and suburb parks and a network of natural environment green corridors aligned with streams. The open space framework includes a neighbourhood reserve within the PC51 site area, located as shown by 'A' in Figure 1 below. The structure plan 'generally proposes a 20m riparian restoration margin along streams', and notes that 'riparian margins... will be protected by either esplanade reserves or other methods'.
- 2.5 The Drury Opāheke Structure Plan includes the following outcomes for the Drury Western centre and surrounding high-density residential areas:
- ensure that residents will be able to access all the services and facilities they need within no more than 10 minutes' walk
 - provide for community and social infrastructure.

Neighbourhood Park Provision

- 2.6 The description of neighbourhood parks in the 'Open Space Provision Policy 2016' is that they offer 'basic informal recreation and social opportunities within a short walk of surrounding residential areas'. Provision targets for neighbourhood parks identified in this policy are that they are available within a 400m walk to residents in high and medium density residential areas, which is approximated by a 300m radial distance. The expected catchment area for a neighbourhood park in high and medium density residential areas is 28.3 hectares which is the area of a circle with a 300m radius, although the catchment area is reduced where walking barriers such as rivers and highways are within the circle. As noted in the 'Open Space Provision Policy' new neighbourhood parks are typically between 0.3 to 0.5 hectares. Network principles are embedded in this policy, and directives include to 'Create a connected network of parks, open spaces and streets that delivers a variety of recreation, ecological, transport, stormwater, landscape and health benefits', and that open spaces are linked together so that 'Open space is core infrastructure that people use to get around their community'. The neighbourhood park network shown in the Drury Opāheke Structure Plan approximates a distribution using 300m radial distances.
- 2.7 The PC51 plan change proposes the following rezoning of Future Urban Zone (FUZ) land:
- 4.61 hectares as Mixed Housing Urban zone ("MHU") which has an anticipated minimum net site area of 300m²
 - 13.75 hectares as Terraced Housing and Apartment Zone (THAB)
 - 15.29 hectares as Town Centre zone ("TCZ"), although as an existing lake with an area of 1.2 hectares is proposed to be retained, this has an effective area of approximately 14.09 hectares.
- 2.8 The proposal is to rezone 32.45 hectares of the land to areas that provide for medium and high-density residential development, and this area is greater than the area of a neighbourhood park walking catchment for medium and high density areas. The area shown as MHU is reduced in the PC51 area than originally proposed in the Drury Opāheke Structure Plan, and it is reasonable to conclude that the residential density of PC51 area may be more than anticipated by the structure plan so that parks and recreation assumptions in the Structure Plan need further examination.
- 2.9 The Precinct Plan for the expanded Drury 1 Precinct shows an indicative neighbourhood park near the northern edge of the PC51 area, (reserve indicated by 'B' in Figure 1 below). An estimated 8.8 hectares of the PC51 area is within a 300m walking catchment area of this park if it is established in this position, however this is not assured at this time. More than 23 hectares of medium and high-density housing proposed in the PPC51 area would not be located within an easy walk of a neighbourhood park even if this park is established. 23 hectares represents more than 80% of the expected catchment of a neighbourhood park. State Highway 22 and the harbour form geographic barriers to the east and south, and there is no assurance that neighbourhood parks will be provided close to the western edge of the PC51 area. A neighbourhood park located in a similar position to that shown by Figure 'C' below would be accessible to most future residents that are not close to park 'A'.
- 2.10 The current proposal does not establish that neighbourhood parks would be created to adequately provide for future residents of the PC51 area, the proposal is not consistent with the Regional

Policy Statement or the AUP which require that open spaces are provided for the recreation and amenity needs of residents, (RPS Objective B2.7.1, B2.7.2, Subdivision Policy E38.3). Neighbourhood park provision does not meet the anticipated outcomes of the 'Open Space Provision Policy' and does not provide assurance that community infrastructure is available for the current plan change as required by the National Policy Statement on Urban Development 2020. The proposal is to rezone an area that is greater than the anticipated catchment of a neighbourhood park without ensuring the provision of a neighbourhood park. The neighbourhood park indicated on the Drury Opāheke Structure Plan is not proposed to be provided within the PC51 area, yet the numbers of future residents may be greater than that anticipated by the Structure Plan.

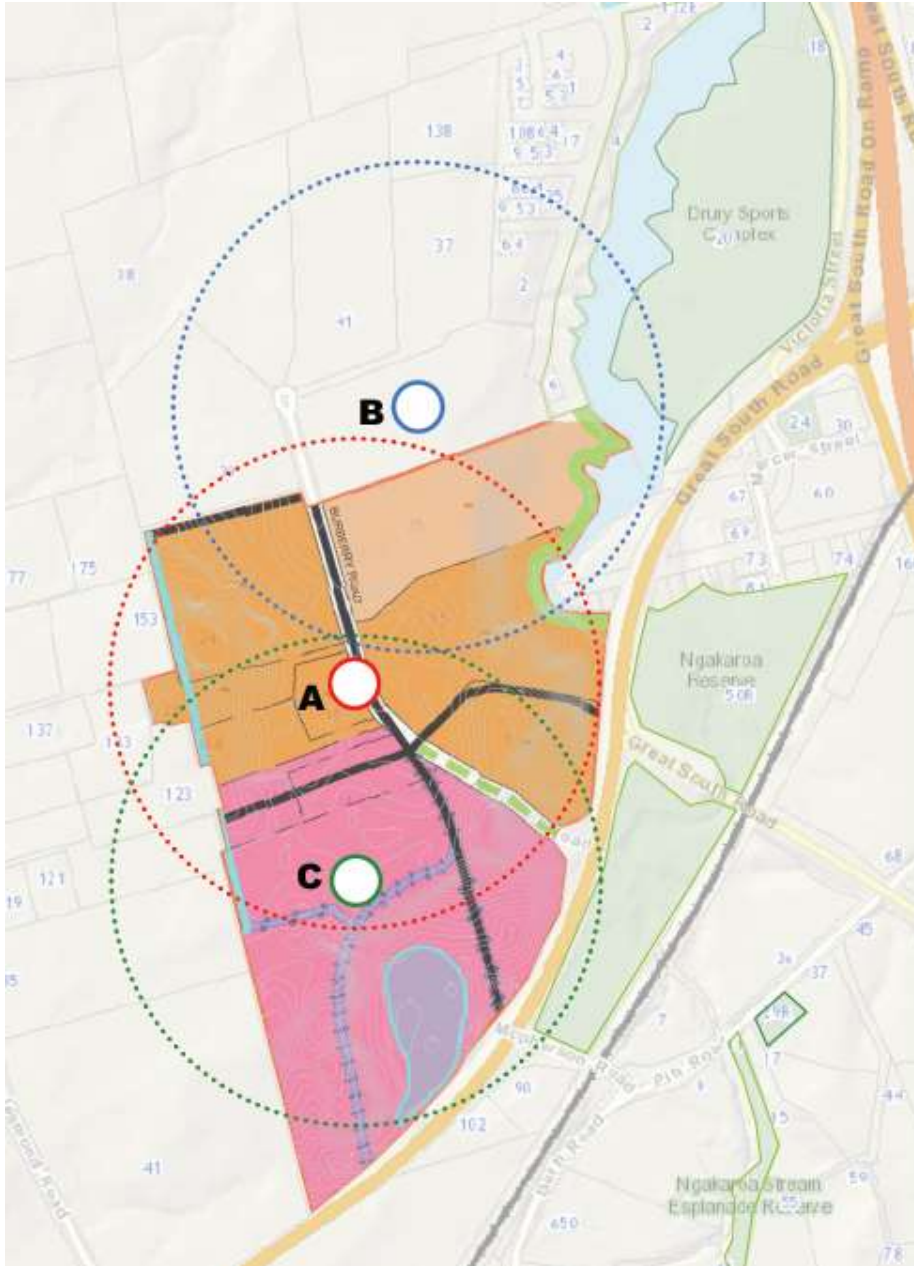


Figure 1: Proposed Precinct Plan overlain on wider map.
*A is the neighbourhood park indicated within PC51 area in Drury-Opāheke Structure Plan.
 B is the neighbourhood park on current Masterplan for Drury 1 precinct on adjoining site.
 C shows a good location for a neighbourhood park if park 'B' is assured.
 Neighbourhood park catchment areas indicated by a dotted line with a radius of 300m.*

2.11 Esplanade reserves vest with Council without acquisition further to sections 230 and 231 of the Resource Management Act. The Parks and Open Space Acquisition Policy 2013 sets out criteria

for purchase or other acquisition of other land for public open space. Should Auckland Council ownership be proposed for any other open space areas, the precinct wording must not require Auckland Council ownership, as the open spaces must be consistent with the council's open space and parks acquisition and provision policies. Further assessment would be needed by the Council Social Policy and Community Investment team in relation to location and acquisition.

Esplanade Reserve and Greenways Provision

- 2.12 Objective B2.7.1(2) of the Auckland Regional Policy Statement requires that public access to and along the coastal marine area, lakes, rivers, streams, and wetlands is maintained and enhanced. The PC51 precinct plan shows the establishment of an esplanade reserve with a width of 20 metres on the edge of the Ngakoroa Stream and Stream Mouth. The application notes that other streams within the PC51 site do not have sufficient width to trigger planning requirements for esplanade reserve provision.
- 2.13 The 'urban design assessment and neighbourhood design statement' provided as part of the application notes that a park-edge collector road would run along the edge of the stream to provide access to the coast, however this is not mentioned in the AEE or shown on the proposed precinct plan. Appendix 3 of the Drury Opāheke Structure Plan directs consideration of park edge roads in relation to transport and land use integration. Section 6.4 of the Drury 1 Precinct rules requires that 'where subdivision adjoins an Open Space Zone or Future Esplanade Reserve on precinct plan 1 and 2 or a recreation reserve to vest then park edge roads must be provided'. I consider that a similar provision should apply to Auranga B2 to ensure public access to and along the coast. This would also improve CPTED outcomes and ease of maintenance for the esplanade reserve.
- 2.14 An assessment of the Ngakoroa Watercourse prepared for Auckland Council in 2018¹ to inform the Drury Opāheke Structure Plan indicates that ecological restoration of the future esplanade reserve is an important function in this location. The PC51 area has text requiring that riparian planting must cover a minimum width of 10m from the bank of a permanent or intermittent stream and the Ngakoroa Stream. The slope and / or level in relation to adjoining land of the proposed esplanade area is not supportive of many recreational activities, and there is no assurance that this area will contribute to recreational outcomes.



Figure 2: Excerpt from the Drury Opāheke Structure Plan at left, (Figure 8: Proposed blue-green network), with proposed areas of network transposed onto Precinct Plan at right.
Provision of other open space

- 2.15 The Southern Structure Plan Area Neighbourhood Design Statement was prepared to support the implementation of the structure plan and plan change processes. The Drury Opāheke Structure Plan and Southern Structure Plan Area Neighbourhood Design Statement identifies a

¹ Ngakoroa Watercourse Assessment Report 2018 Auckland Council

blue-green / green network of indicative natural environment and paths. Figure 2 above shows where this network is proposed within the area of the proposed precinct plan. The primary directives in the Green Network section of the Southern Structure Plan Area Neighbourhood Design Statement for spatial planning to inform plan change development are as follows:

1. Identify a green network that enhances and compliments the existing natural systems, and the future movement network of streets and pathways.
2. Define natural features and habitats through public spaces and front these with development to ensure they are safe.

The green network areas proposed in the Drury Opāheke Structure Plan have not been identified on the proposed Precinct Plan, and no assurance is provided that these would be created on subdivision to meet the anticipated outcomes of the Drury Opāheke Structure Plan. The requirement in the proposed plan change text for a 10m wide area of riparian vegetation to be planted either side of both permanent and ephemeral streams will create green connections, however it does not provide other outcomes that would be provided by the blue-green network including movement and recreational outcomes. These effects will potentially extend beyond the PC51 site as they will not allow links to other greenways networks.

- 2.16 The Urban Design Assessment for the application states that a 'civic open space of some form' will be developed in the town centre, and that a 'high amenity area' around the lake is proposed, however in the current proposal these would be private open space and may not provide for all future residents or at all times they are wanting to use open space. It is recommended that a civic space that provides a public open space function is provided.
- 2.17 The parks framework included in the 'Open Space Provision Policy 2016' includes suburb parks which are larger than neighbourhood parks and provide for informal recreation and sometimes formal recreation including sports fields to be located within a 1 kilometre walk, (approximately 750m radial distance) of medium and high density residential properties. The distribution of suburb parks shown in the Drury Opāheke Structure Plan does not include one within the B2 Precinct area, and the PC51 site area is well below the catchment for a suburb park, so provision of a suburb park within the plan change site is not expected.
- 2.18 Sports facilities in the local area include significant multisport facilities at Karaka Sports Park, Drury Sports Complex and Opaheke Sports Park. The need for additional sports facilities within the PC51 area is unlikely however a full strategic sports network assessment would be required to quantify this.

Summary of key parks and recreation issues

- 2.19 A neighbourhood reserve within the plan change area would be consistent with the Drury Opāheke Structure Plan and background planning documents to this structure plan. The PC51 area is greater than the catchment area for a neighbourhood reserve, however one has not been provided to meet the needs of future residents. The current proposal does not establish that the recreation need for neighbourhood reserves has been met and is therefore not consistent with the AUP, Section B2.7 of the Auckland Regional Policy Statement, (including policy 4 that requires open spaces to be provided where there is an identified deficiency) and the National Policy Statement on Urban Development 2020. To meet provision targets identified in the Open Space Provision Policy, a neighbourhood park should be located where it is within a 400m walk of most future dwellings. It is my assessment that provision of a centrally located neighbourhood park is needed to meet the recreational needs of future residents of the PC51 area.
- 2.20 Greenways have not been provided to meet the anticipated outcomes and blue-green network benefits of the Drury Opāheke Structure Plan or Section B2.7 of the Auckland Regional Policy Statement including Policy B2.7.2(2) that promotes the physical connection of open spaces to enable people and wildlife to move around efficiently and safely. It is recommended that the blue-green network is identified on the structure plan, including alignment with movement networks and other recreational outcomes.

3 Applicant's assessment and review

Park provision

3.1 The AEE does not provide an overview of open space and recreation issues and does not refer to Auckland Council Parks Planning documents. Section 7.11.11 states that 'The Auranga community is planned to have a variety of outdoor spaces (parks, recreational walkways) and community facilities (primary and secondary schools) to support the planned growth (for the full build out of the Drury West area)', however at this time there is no assurance that open space would be available to meet the neighbourhood park needs of future residents.

3.2 Proposed parks

The urban Design Assessment for the Applicant states the following:

- 'there is no identified need for new open space on the Site'
- 'the PPC area is already serviced by two Neighbourhood Reserves, proposed as part of the Drury 1 Precinct Plan'
- 'formal public open spaces, other than what would be required as an esplanade reserve along the Ngakoroa Stream, are not proposed'.

As demonstrated in Figure 1 above, my analysis is that the proposed open space does not adequately provide for the open space needs of future residents in relation to parks, and that the Applicant's assessment is not consistent with Section B.2.7 of the Auckland Regional Policy Statement or Auckland Council's 'Open Space Provision Policy 2016'.

3.3 Auckland Council's 'Open Space Provision Policy 2016' notes that the following focus areas for greenfield areas

- investing in new open space when growth occurs
- integrating open space with stormwater, transport, schools, and community facilities
- creating a resilient and multi-functional open space network that can evolve with changing community needs over time
- connecting new and existing open space networks.

The proposed development does not establish that the open space network anticipated by the Drury Opāheke Structure Plan has been provided and does not establish a connected or integrated open space system that could be partially fulfilled by greenways. If not established at precinct plan, it is my opinion that establishment through subsequent resource consent processes is not assured.

3.4 The proposed Auranga B2 text is considered in Table 1 below, and recommended additions to the text included in Table 2.

Table 1: Proposed Plan Change Text relevant to parks planning

Reference	Proposed text	Comment
IX.3 Policies		
Development	(2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development: ...b) Public open spaces and pedestrian and cycle linkages;	The Structure Plan does not incorporate public open space other than an area of esplanade reserve which would be provided on subdivision under general subdivision rules in the Auckland Unitary Plan (AUP) The s32 notes that no public open spaces other than esplanade reserves are proposed. While this text is supported, further areas of proposed public open space need to be identified on the Precinct Plan to promote open space outcomes
	(2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development: ...c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct	Road linkages are shown on the proposed Precinct Plan, however Greenways linkages shown in the Drury Opāheke Structure Plan have not been incorporated into this plan and need to be identified so the anticipated outcomes of the Structure Plan are realised.

		It is recommended that proposed text be amended as follows: 'Linkages <u>including Greenways linkages</u> within the Precinct and to adjacent land including the Drury 1 Precinct' so that these are incorporated into development'
	(2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development: ...f) Open space areas;	No public open space areas are proposed other than esplanade reserve which are anticipated by AUP development rules, and no other open space areas are shown on the Precinct Plan. It is recommended that additional areas of proposed public open space are indicated on the Precinct Plan to strengthen this wording and to promote open space outcomes
Stormwater Management	(6)(b) Incorporate enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature.	Riparian planting is consistent with Auckland Council Policies including the Biodiversity Strategy 2012 as well as National Policies and is an anticipated component of esplanade reserve development in this area. This policy is supported for future Council esplanade reserve areas and future greenways.
IX.6.3 Standards		
Riparian Planting	(1) The riparian margins of any wetland, permanent or intermittent stream and the Ngakoroa Stream must be planted to a minimum width of 10m measured from the top of the stream bank, except where road or pedestrian crossings are required over streams	These intermittent and permanent streams are not currently shown on the Precinct Plan. It is recommended that they are shown on the Precinct Plan as a green network to highlight this requirement to landowners. This standard is supported for future Council esplanade reserve areas and future greenways.
	(2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) must: (a) include a plan identifying the location, species, planting bag size and density of the plants; (b) use eco-sourced native vegetation where available; (c) be consistent with local biodiversity; (d) be planted at a density of 10,000 plants per hectare, unless a different density has been approved on the basis of plant requirements.	This standard is supported.

Table 2: Recommended additions to proposed Plan Change Text

Reference	Issue	Comment and recommended text
Park edge road	The 'urban design assessment and neighbourhood design statement' notes that 'The PPC will integrate with the existing subdivision pattern of the Drury 1 Precinct, and that includes a park-edge collector road that runs along the western side of the Ngakoroa Stream. This will allow users of the centre to readily	A requirement for a park edge road is included in the policies and subdivision controls in the Drury 1 Precinct rules where it provides improved public access to the esplanade reserve as well as improved CPTED and maintenance outcomes. It is recommended for that the following text is included in plan change text:

	access the coast', however this is not shown on the precinct plan or mentioned in the AEE.	Policies: <u>Encourage roads to form urban blocks and to front public open spaces.</u> Subdivision Controls: <u>Park Edge Roads 1. Where subdivision adjoins an Open Space Zone or Future Esplanade Reserve on the precinct plan or a recreation reserve to vest then park edge roads must be provided.</u>
	Neighbourhood reserve	If a neighbourhood reserve is added to the Precinct Plan, the following wording is recommended: Standards <u>Fences fronting a neighbourhood park open space shown on the precinct plan must not exceed 1.2m in height.</u>
	Assessment matters have not been incorporated in the proposed plan change text to recognise the anticipated outcomes of the Drury-Opāheke Structure Plan.	The following assessment matters are recommended for restricted discretionary subdivision activities to support improved public open space outcomes: + The interface of subdivision and development with open space areas, including riparian margins. + The integrated blue-green network outcomes sought by the Drury-Opāheke Structure Plan

Drury-Opāheke Structure Plan

- 3.5 The Application AEE notes that the Drury-Opāheke Structure Plan identifies a green network through the plan area, however the indicative network shown in the structure plan is not identified in the Precinct Plan. As noted in the Application AEE, the Drury-Opāheke Structure Plan seeks the following outcomes:
- Design neighbourhood parks which are fit for purpose and safe, in the appropriate locations.
 - protect and enhance the green network that supports the area including through water sensitive design, tree planting, parks, greenways and riparian enhancement margins
- 3.6 The Application AEE states that park design is a matter for development stages and not a PPC matter, and that the proposal achieves the criteria of the green network through the inclusion of the lake as a key amenity feature. This conclusion is not consistent with specialist and community documents prepared as background to the Drury-Opāheke Structure Plan and does not achieve the integrated outcomes anticipated by the Structure Plan. As discussed above, it is my assessment that further assurance needs to be provided that community infrastructure needs will be met by the provision of an indicative neighbourhood reserve within the plan change area, and that green links identified in the Drury-Opāheke Structure Plan need to be shown on the Precinct Plan.

National Policy Statement on Urban Development 2020

- 3.7 This policy statement was released in August 2020 and requires that Local Authorities must be satisfied that the additional infrastructure to service the proposed development capacity is likely to be available. The application does not demonstrate that sufficient public infrastructure including open space has been provided for future residents. There are no impediments on most greenfields sites to provision of an open space network that meets Auckland Council policies. This application fails to demonstrate that necessary community infrastructure will be provided in relation to parks provision.

Review summary

- 3.8 It is my assessment that the plan change as proposed does not provide sufficient assurance that the outcomes anticipated by AUP, the National Policy Statement on Urban Development or

Auckland Council policies and plans including the creation of a connected and integrated open space system will be achieved in later resource consent processes, or to demonstrate that appropriate community infrastructure will be provided.

4 Submissions

4.1 Matters raised in submissions and further submissions to the PC51 plan change relevant to Parks, Sport and Recreation are summarised and considered in Tables 3 and 4 below.

Table 3: Comment on submissions received relevant to parks planning

Ref	Submitter	Submission	Comment
33	Ngāti Te Ata Waiohua	minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways;	Support for additional protection over riparian margins of permanent and intermittent streams as part of a green network
		Park edge design adjacent to all waterways; (assumed to be park edge road design)	Support for proposed road along coastal esplanade reserve, support for park edge road design along other esplanade reserves that may be created for improved public access, CPTED outcomes and easier parks maintenance
35	Auckland Council	Amend policy IX.3 (6)(b) as follows: 'Incorporate biodiversity enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature.	Support for this amendment where it relates to reserves to be vested with Council as it is consistent with the Auckland Council 'Biodiversity Strategy 2012' and 'Parks and Open Spaces Strategic Action Plan 2013', although it is noted that consistency with local biodiversity is a requirement of proposed standard IX.6.3(2)(c)
		Include indicative permanent and intermittent streams and wetlands on the precinct plan. & Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.	Support for including the green corridor links shown in the Drury-Opāheke Structure Plan to ensure that the anticipated outcomes of this network including connections to other areas are achieved
		Amend the precinct plan "Future esplanade reserve" to read "Indicative future esplanade reserve".	Neither support nor oppose – the esplanade reserve is indicated on the precinct plan at an approximate width of 20 metres which is the outcome anticipated in the AUP
		Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.	Support for additional open spaces to be shown on the precinct plan including a neighbourhood reserve and civic space
		Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan.	While protection of the First Gas transmission line is supported, a park over the line may have significant development restrictions and alternative uses including a road should be considered

		Provide a notable tree assessment and scheduling of any notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.	Support – a notable tree assessment may provide useful background to the location of a possible neighbourhood reserve.
40	Ministry of Education	Policy IX.3 (2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:(... (b) Public open spaces and Pedestrian and cycle linkages <u>to public open spaces and schools</u> ;	Do not support - This amendment is not aligned with other amendments sought that public open space should be shown on the precinct plan and recognised during development
41	Heritage NZ	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents	Support for this amendment, where it relates to Esplanade reserves to be vested with Auckland Council. It is consistent with the Auckland Council 'Parks and Open Spaces Strategic Action Plan 2013': Areas of Focus: Treasure our parks and open spaces
43	Kāinga ora	Request rewording of Standard IX.6.3(2) as follows: The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) Any development or subdivision of <u>land that contains a stream</u> must:(a) include a plan identifying the location, species, planting bag size and density of the plants;[...]"	Support for this amendment which will give greater assurance that riparian takes place as part of development.
44	Ngāti Tamaoho	Minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways;	Support – refer submission 33 above
		Park edge design adjacent to all waterways;	Support – refer submission 33 above

Table 4: Comment on further submissions received relevant to parks planning where further issues raised

Ref	Submitter	Submission	Further comment
FS9	Heritage New Zealand Pouhere Taonga	S44: Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways. Heritage NZ supports the submission for the reason that riparian margins often contain archaeological sites relating to past Maori.	A 20m margin is ideally provided for all waterways, however the planting width should be reduced where the margin would include a shared path. A 20m riparian width would allow more integrated outcomes for stormwater and biodiversity anticipated by the Structure Plan
FS12	Kāinga Ora	Apply a minimum of 20 m riparian margin for all waterways Opposes the submission- the AUP generally sets a consistent 10m riparian yard requirement for all streams and a 20m margin would have development implications	Disagree – refer comment on FS9 above
FS13	Karaka and Drury Ltd	S35: Include indicative permanent and intermittent streams and wetlands on the precinct plan.	Identification of the green network on the Precinct Plan would provide additional assurance that these would be

		Oppose: The identification (or lack thereof) of streams and/or wetlands on the Precinct Plan does not change the level of protection afforded to streams under the AUP or the National Environmental Standard for Freshwater 2020 (“NES Freshwater”), and having provisions which require riparian margins does not justify the need to identify where those are to be located at a PPC level.	recognised in later development. The anticipated outcomes of the Drury Opāheke Structure Plan are not fully considered by consideration under NES and AUP provisions
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5 Conclusions and recommendations

- 5.1 The current proposal does not establish that future residents of the PC51 area would have adequate access to neighbourhood parks. The proposal is to rezone an area that is greater than the anticipated catchment of a neighbourhood park without ensuring the provision of a neighbourhood park. The proposal is not consistent with the Regional Policy Statement or the AUP which require that open spaces are provided for the recreation and amenity needs of residents, (RPS Objective B2.7.1, B2.7.2, AUP Subdivision Policy E38.3). Neighbourhood park provision does not meet the anticipated outcomes of the ‘Open Space Provision Policy’ and does not provide assurance that community infrastructure is available for the current plan change as required by the National Policy Statement on Urban Development.
- 5.2 It is recommended that the precinct plan for the PC51 area is amended to show a neighbourhood reserve located where it will provide for the majority of future residents.
- 5.3 The proposed structure plan shows esplanade reserves to be vested along the coastal edge, however it does not identify or otherwise ensure the creation of the connected and integrated blue/green network anticipated by the Drury Opāheke Structure Plan. It is my assessment that the plan change as proposed does not provide assurance that the outcomes anticipated by the AUP and the Regional Policy Statement to create a connected and integrated open space system will be achieved if not identified on the proposed structure plan.
- 5.4 It is recommended that the blue-green network is identified on the structure plan, including alignment with movement networks and other recreational outcomes, and that the creation and development of these areas is consistent with the Southern Structure Plan Area Neighbourhood Design Statement and Policy B2.7.2 (1) of the Regional Policy Statement.
- 5.5 Recommended changes to the plan change text are listed in Table 2 above, and include that park edge roads are to be provided adjoining esplanade reserves and other open space.
- 5.6 Comment is provided above in relation to submissions and further submissions to the proposed plan change.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

16 February 2021

To: David Mead, Reporting Planner
From: Robert Brassey, Principal Specialist Cultural Heritage

Subject: Private Plan Change – PC51 (private): Drury 2 Precinct, Drury – Historic Heritage Assessment (archaeology)

1.0 Introduction

1.1 I have undertaken a review of the private plan change on behalf of Auckland Council in relation to effects on historic heritage. My review is focussed on effects on archaeological sites and does not address effects on mana whenua cultural values. There are no identified buildings of potential heritage value within the plan change area.

I have a Master of Philosophy degree with first Class Honours in anthropology specializing in New Zealand and Pacific archaeology. I have worked in the field of historic heritage management for nearly 40 years, including more than 20 years for Auckland councils. My experience spans archaeology, built and maritime heritage and heritage policy and planning.

1.2 In writing this memo, I have reviewed the following documents:

- PC 51 Attachment 4 Section 32 Analysis
- Attachment 3 Auranga B2 text
- Attachment 3 Precinct Plan
- PC 51 Assessment of environmental effects
- Drury-Opāheke Structure Plan 2019
- Drury Structure Plan historic heritage topic report 2017
- Relevant submissions and further submissions as identified below

2.0 Key historic heritage Issues

No archaeological or heritage report, or assessment of notable trees has been provided. The applicant has instead relied on the heritage provisions in the Drury-Opāheke Structure Plan (**DOSP**) and the DOSP historic heritage topic report.

There are no recorded archaeological sites or other historic heritage places within the plan change area. The main issue is the potential for unidentified archaeological sites to be present along the margins of the Ngākoroa Stream where it is adjacent to the plan change area, and how this potential should be managed. The lack of an assessment of notable trees is an information gap that may potentially have implications for historic heritage.

3.0 Applicant's assessment

No separate historic heritage assessment has been provided. The applicant addresses heritage matters at 2.16 in the Assessment of Environmental Effects (**AEE**) report. The applicant has relied on the heritage provisions in the DOSP and DOSP historic heritage topic report, together with consultation and cultural values assessments supplied by iwi groups. The AEE report notes (6.4.11) that cultural values assessments have acknowledged that there was no significant historical occupation in the area.

The applicants AEE concludes that there is no evidence of pre-1900 archaeology or other [historic] heritage within the plan change area, and that no adverse effects are anticipated in relation to archaeological or built heritage. It further concludes that site-specific reports can be

prepared for specific future resource consents, whilst accidental finds can be managed using the AUP accidental discovery protocols [rules].¹

There are no historic heritage provisions in the proposed precinct plan.

4.0 Assessment of historic heritage effects and management methods

The DOSP historic heritage topic report does not identify any archaeological sites, built heritage or places of interest within the structure plan area. However, this document is a high-level desktop report not intended to be a substitute for archaeological assessment prior to development.

There have been some advances in the understanding of settlement patterns in the Drury since the structure plan topic report was prepared as a result of additional research, site recording, and earthworks monitoring that has taken place in the last few years. While the coastal environment was clearly used for resource gathering, the Drury-Karaka lowlands away from the coastline were unattractive for Māori cultivation and habitation and there are few identified archaeological sites. There is evidence to indicate that inland waterways were used to gather food resources, and that the navigable section of the Ngākoroa Stream was used as an inland transport route. Unidentified/unrecorded sites of Māori origin may occasionally be present in favourable locations along the banks of that stream. An example is midden/terrace site R12_1153, which is located 240m downstream from the plan change area.

Unrecorded sites of Māori origin are however unlikely to be present further inland beyond the stream margins in my opinion. No sites were detected during earthworks monitoring for the Auranga B1 development, which is adjacent to the plan change area. None were identified in the heritage assessment for the Waipupuke private plan change, which is also adjacent to the plan change 51 area.

In my opinion, if unrecorded archaeological sites associated with Māori occupation are present within the plan change area, they are likely to be located within ca 20 m of the shoreline of the Ngākoroa Stream as it existed in the pre-European period.

I note that the precinct plan provides for a 20m wide esplanade reserve along the Ngākoroa Stream.² However the applicants have proposed that this be intensively planted. Without avoidance, this would potentially modify or destroy any currently unidentified site within the reserve.

The possibility of archaeological sites associated with historic era European occupation or activities cannot be excluded without detailed research. However, I am unaware of any reported evidence to suggest that this is likely.

5.0 Submissions and further submissions

5.1 Heritage New Zealand Pouhere Taonga (Heritage New Zealand) (#41)

In relation to archaeological sites, Heritage New Zealand seeks that provisions are included in the precinct plan to:

- Require archaeological field survey and assessment of the plan change area through the resource consenting process at the subdivision stage
- Require assessment of riparian margins of streams that are to be planted to avoid impacts on archaeological sites
- Address any identified Māori cultural values.

Heritage New Zealand has provided further submissions on a number of primary submissions, in relation to historic heritage.

¹ AEE, 2.16.2; 6.4.2-4

² AEE, 6.12.13

Heritage New Zealand (FS 9) has submitted in support of submissions by Ngāti Te Ata Waiohua (#33) and Ngāti Tamaoho (#41) that a minimum 20 metre riparian margin be applied to all waterways. The basis for Heritage New Zealand's further submission is that riparian margins often contain archaeological sites relating to past Māori activity and this amendment would better provide for the avoidance and retention of such sites.

Heritage New Zealand has also submitted in support of a submission by Auckland Council (FS 35) seeking the provision of a notable tree assessment and scheduling of any notable trees identified in the assessment.

Josephine Kleinsman (FS 10) has provided a further submission in support of the original submission by Heritage New Zealand.

5.2 Response

I consider the potential for unidentified archaeological sites to be present within the plan change area to be generally low. The exception is within the riparian margins of the Ngākoroa Stream, where I consider there to be some potential for insubstantial sites such as middens or short-term occupation sites associated with Māori occupation to be present. The likelihood of such sites meeting the Auckland Unitary Plan (**AUP**) Historic Heritage RPS criteria for inclusion in the heritage schedule 14.1 is very low, in my opinion.

If the plan change was to go ahead without provisions, including rules, requiring identification and assessment of archaeological sites prior to development, the AUP subdivision and land disturbance rules would not trigger resource consent requirements to undertake this work. Therefore, there are two options for managing unidentified sites:

- Include precinct provisions as proposed by Heritage NZ
- Rely on the Heritage New Zealand Pouhere Taonga Act (**HNZPTA**), and the AUP Accidental Discovery Rule (**ADR**).

Where there is known information to suggest that there is the potential for significant historic heritage to be present in a plan change area, and an adequate assessment has not been provided, I would consider it appropriate to include precinct provisions requiring such an assessment prior to subdivision or land disturbance. As I have stated above, I consider the likelihood to be very low in the case of this plan change area.

In my view it would be appropriate in this case for the second of the two options to be adopted – that is to rely on the HNZPTA and the ADR to manage unidentified heritage. Both the HNZPTA and ADR include provisions to address any Māori cultural heritage values identified.

In order to ensure that archaeological sites and extents are identified prior to riparian planting taking place along the Ngākoroa Stream, I propose that the precinct provisions are amended as follows:

IX.6.3 Riparian Planting

- (1) The riparian margins of a permanent or intermittent stream and the Ngakoroa Stream must be planted to a minimum width of 10m measured from the top of the stream bank, except where road or pedestrian crossings are required over streams.
- (2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) must:
 - (a) include a plan identifying the location, species, planting bag size and density of the plants, and an archaeological assessment prepared by a professionally qualified archaeologist showing the location and extent of any archaeological sites to be avoided;
 - (b) use eco-sourced native vegetation where available;
 - (c) be consistent with local biodiversity;
 - (d) be planted at a density of 10,000 plants per hectare, unless a different density has been approved on the basis of plant requirements.

I do not agree with the reasoning behind the further submission by Heritage New Zealand in support of a minimum 20 metre margin along all waterways – that is that riparian margins often contain archaeological sites of Māori origin. I agree that this statement is correct in relation to navigable streams. However, it is not applicable in relation to all waterways. As I have noted above there is a low likelihood of sites being present in this plan change area, other than along the Ngākoroa Stream, where the precinct plan already provides for a 20m riparian margin. I do not support the further submission for this reason.

I do support the further submission by Heritage New Zealand and the original submission by Auckland Council seeking a notable tree assessment and scheduling of trees, where appropriate.

Relict plantings can sometimes be an indicator of subsurface historic-era archaeological sites. Planted trees can contribute to the setting of historic heritage places or be significant historic heritage features of value or significance.

It is usual practice for a survey of private plan change areas to be undertaken for potential notable trees, including any that are of historic heritage value. Those meeting the criteria should be scheduled as notable trees or, where appropriate as part of a scheduled historic heritage place.

6.0 Conclusions and recommendations

The applicant has assessed the private plan change effects on the environment related to historic heritage. The AEE concludes that there is no evidence of archaeological sites or other historic heritage in the plan change area.

Although no separate archaeological or heritage assessment have been provided to support this conclusion, in my opinion there is a very low likelihood of significant unidentified archaeological sites being present.

The applicant has not provided an assessment of notable trees of potential historic heritage value or significance within the plan change area and I consider this to be an information gap that should be addressed. Any trees meeting the relevant AUP criteria should be scheduled.

I consider that effects on currently unidentified archaeological sites, where present in the plan change area, and associated Māori cultural values, can be managed under the provisions of the HNZPTA and AUP ADR, and by amendment of the precinct provisions to require a prior archaeological assessment of riparian planting areas.

With such an amendment, and implementation of the recommendation in relation to notable trees, I am able to support the proposed plan change.

Auckland Council
michael.luong@aucklandcouncil.govt.nz

26 November 2020

Our Ref: 200230-C

Attention: Mr Michael Luong

Dear Mr Luong

GEOTECHNICAL ASSESSMENT PROPOSED PRIVATE PLAN CHANGE 51 FOR AURANGA (B2), BURBERRY ROAD, DRURY

1.0 Introduction

Riley Consultants Ltd (RILEY) has been engaged by Auckland Council (Council) to review the geotechnical aspects of the proposed Private Plan Change 51 (PPC51) for the site at Burberry Road, Drury and provide technical advice to assist them to prepare their Section 42A report.

2.0 Key Issues

The key geotechnical issues identified for the proposed PPC51 land are slope stability, ground settlement potential, liquefaction, and lateral spread. These issues are discussed in a previous RILEY report prepared for the Drury-Opaheke Structure Plan. The report is titled Drury-Opaheke Structure Plan, Background Investigations, Geotechnical and Coastal Erosion Assessment (RILEY Ref: 170275-F, dated 23 July 2018).

3.0 Review

In preparing this geotechnical assessment we have reviewed the following report.

- Preliminary Geotechnical Appraisal Report, prepared by Lander Geotechnical Ltd (LGL), for Auranga B2 Re-zoning Concept, Drury, reference J01132 (Rev.1), dated 4 March 2019.

Following review of the LGL geotechnical report, we considered that slope instability, ground settlement potential, liquefaction, and lateral spread had been suitably addressed for the majority of the site. However, we considered that the lateral spread potential for land in proximity to the stream/estuary and the lake had not been addressed.

Accordingly, we raised the following query:

Please provide comment on the assessed lateral spread risk of the land in proximity to the stream/estuary. Please also include comments regarding the lateral spread potential of land adjacent to the lake located in the south western part of the B2 area.

The response from the Applicant is presented below.

The necessity for any site specific comment relating to lateral spread in proximity to features/streams is already addressed by existing AUP provisions (including Chapter E38 Subdivision and E12 Earthworks). There are existing controls in place to allow the consideration of these matters at the time of resource consent application. No further rules or discretions are considered necessary in the PPC.

Our comment back to Council is presented below.

We have reviewed the applicant's response to our query regarding lateral spread. Lateral spread is a significant hazard (e.g. was considered to have a high potential within 100m of the foreshore) that was identified in the DOSP (Drury-Opaheke Structure Plan) work and in our view is relevant to considerations as to whether the land is suitable for re-zoning. We accept that resource consent level inputs are not required but we consider the applicant's geotechnical engineer still needs to comment on lateral spread such that Council can be satisfied that the land proposed to be re-zoned is not fundamentally unsuitable or that the hazard could not be mitigated.

4.0 Assessment

From our review of the geotechnical report provided and the subsequent response to the query raised, we consider that the geotechnical investigations carried out to date and recommendations presented by LGL in relation to the PPC51 proposal are appropriate for the site. However, no comment has been provided regarding the lateral spread potential in proximity to the stream/estuary or the lake.

The query raised by RILEY with regard to lateral spread arose from the identification of sandy materials in several of the LGL hand auger boreholes in proximity to the Nakaroa Stream/Estuary. These materials may be susceptible to liquefaction and lateral spread. In our professional opinion this needs to be addressed as the geotechnical assessments completed for the Drury-Opaheke Structure Plan identified the land adjacent to the stream/estuary as having a lateral spread risk of the adjacent slope faces with an associated high potential development premium. The issue is currently unresolved.

Specifically, we note that LGL recommend further geotechnical investigation, analysis and reporting to support future resource and building consent applications. We concur that further geotechnical input is required and would need to address all geotechnical hazards to future development including lateral spreading.

5.0 Submissions

A total of 44 submissions have been received and reviewed. From our review of the submissions from the above parties none of them have raised any geotechnical issues or queries.

6.0 Recommendation

We consider that the geotechnical investigations and reporting carried out by LGL in support of PPC51 have demonstrated that the majority of the site can accommodate the proposal from a geotechnical perspective and that there are conventional geotechnical solutions available for building foundation design. However, the geotechnical investigations and report have not addressed the potential for lateral spread of the land in proximity to the stream/estuary and lake. RILEY raised a query on this point with LGL and we consider that the response was insufficient to resolve the query. Subject to suitable resolution of the query, we consider that from a geotechnical perspective the site is suitable for future development.

Further geotechnical input will be required to support future resource and building consent applications to Council. This input will need to include specific geotechnical investigations, analyses and reporting to facilitate detailed building foundation design and to ensure that all relevant geotechnical issues are appropriately addressed in relation to future specific building proposals.

7.0 Limitation

This report has been prepared solely for the benefit of Auckland Council as our client with respect to the brief. The reliance by other parties on the information or opinions contained in the report shall, without our prior review and agreement in writing, be at such parties' sole risk.

Yours faithfully

RILEY CONSULTANTS LTD

Prepared by:



James Beaumont
Senior Geotechnical Engineer

Reviewed and approved for issue by:



Scott Vaughan
Project Director, CPEng

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

15 February 2021

To: Emily Buckingham, Consultant Lead Planner, Hill Young Cooper Ltd, for
Auckland Council

From: Andrew Kalbarczyk, Senior Specialist – Contaminated Land, Contamination, Air &
Noise, Specialist Input, Resource Consents

**Subject: Private Plan Change – PC51, Auranga B2 (Drury 2) Precinct, Karaka and
Drury Ltd, Drury West – Contamination Assessment**

1.0 Introduction

I have undertaken a review of the request for the above Private Plan Change, on behalf of Auckland Council in relation to potential adverse effects on human health and the receiving environment, associated with the potential contamination within the subject area.

The area of the proposed Private Plan Change covers approximately 33.65ha of land in total. The subject area is currently zoned in the Auckland Unitary Plan (Operative in Part) as 'Future Urban Area' and made up of lifestyle blocks with pastoral grazing fields. The Private Plan Change request seeks to re-zone the subject area to a 'Business: Town Centre' zone (15.29ha), a 'Residential: Mixed Housing Urban' zone (4.61ha), and a 'Residential: Terrace Housing and Apartment Buildings' zone (13.75ha).

I hold a MSc degree in Environmental Biology from University of Warsaw (Poland) and Certificate in Environmental Science from Thames Polytechnic in London. I hold a Certified Environmental Practitioner: Site Contamination Specialist certification from the Certified Environmental Practitioner Scheme, established as an initiative of the Environment Institute of Australia and New Zealand (EIANZ), aimed at advancing ethical and competent environmental practice. I work as a Senior Specialist – Contaminated Land in the Contamination, Noise & Air Team, Specialist Input, Resource Consents. I have held this role at Auckland Council and formerly Auckland Regional Council since 2006. I have extensive experience within contaminated land management, resource consenting, and consent compliance monitoring relevant to contaminated land.

In writing this memo, I have reviewed the following documents lodged in support of the proposed Private Plan Change:

- S32 Assessment Report: *Auranga B2 Private Plan Change Request: Planning Assessment: Section 32 Assessment: Application to Auckland Council pursuant to Schedule 1 of the Resource Management Act 1991: Proposed Drury 2 Precinct in the Auckland Unitary Plan*, prepared by Tollemache Consultants Ltd, dated May 2020
- Technical Investigation Report: *Technical Investigation: Contamination Assessment: Drury Future Urban Zone*, prepared for Auckland Council, by Riley Consultants Ltd, dated 16 March 2018
- Preliminary Geotechnical Report: *Preliminary Geotechnical Appraisal Report for Auranga B2 Re-zoning Concept, Drury*, dated 4 March 2019, prepared by Lander Geotechnical Consultants Ltd.

2.0 Key contamination issues (relevant to protection of human health and the environment)

This Private Plan Change request is reported to fall within the wider Auranga Master Plan and the Drury-Opāheke Structure Plan, endorsed by Auckland Council on 6 August 2019. It is generally consistent with the concurrently-lodged three Private Plan Change requests, associated with the future development within the Drury Future Urban Zone, made by Kiwi Property Holdings No.2 Ltd, Fulton Hogan Land Development Ltd, and Oyster Capital Ltd.

I consider the following regulations, plan, and policy statements to be relevant to the assessment of the proposed Private Plan Change request, in the context of contamination of the land and the associated effects on human health and the environment:

- *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations*, Ministry for the Environment, 2011 (NES:CS)
- Chapter E30 of the Auckland Unitary Plan (Operative in Part) (AUP(OP)), Objectives E30.2(1) and Policies E30.3.(1 and 2)
- The Auckland Council Auckland Regional Policy Statement, particularly Section 17, Objectives 17.3.1-3, and Policies 17.4.1.1-4
- National Policy Statement for Freshwater Management, updated in 2020, particularly Part 2, Objectives 2.1(1)(a-c), and Policies 2.2(1-5 and 13).

The current assessment of the Private Plan Change request and supporting documentation is focused on identifying any major constraints, associated with the contamination status of the subject area, which would present an impediment to the proposed re-zoning of the land into generally more-sensitive land use. Any other than major constraints, associated with potential contamination of the subject area can be dealt with at a later stage, under the requirements of the relevant regulatory consenting process, associated with the future development.

Detailed assessment of the suitability of individual parcels of land within the area subject to the proposed Private Plan Change will need to be undertaken prior to obtaining relevant resource consents required for carrying out land-disturbance works, the actual change of land use, and subdivisions. The regulations, plan, and policy statements listed above will be applicable once again during the consenting process, and at that stage site-specific investigations and remediation of the land (where required) will be carried out. To those pieces of land within the subject area, which have formerly been affected by any contaminating activities, the regulations of the NES:CS and Contaminated Land Rules of the AUP(OP) will be relevant and considered in the consenting process.

Based on the reviewed Technical Investigation Report, the following sources of contaminants of concern have been identified as the potential constraints to the proposed Private Plan Change and relevant future development:

- Existing building structures constructed prior to 1980
Those are associated with the presence of lead and asbestos in the cladding/roofing of the building structures and in the shallow subsurface soils. The contamination status of such soils would need to be determined through a process of undertaking a site-specific Preliminary Site Investigation/Detailed Site Investigation. In case such investigations reveal the presence of unacceptably elevated levels of lead and/or asbestos (exceeding the relevant standards for protection of human health or guidelines for the protection of the environment), remediation of the affected sites and controlled disposal of the contaminated soil will be required.
- The presence of some commercial/industrial land-use properties within the subject area
Depending on the type of commercial/industrial activities, the soil within such properties may be contaminated with a number of heavy metals, polycyclic aromatic hydrocarbons, or volatile organic compounds. The contamination status of such soils would need to be determined through a process of a site-specific Preliminary Site Investigation/Detailed

Site Investigation. In case such investigations reveal the presence of unacceptably elevated levels of contaminants, remediation of the affected sites and controlled disposal of the contaminated soil will be required.

- The presence of closed landfills within the subject area
Depending on the outcome of a site-specific Preliminary Site Investigation/Detailed Site Investigation, the soils within the given land may be adversely affected by landfill gas, heavy metals, polycyclic aromatic hydrocarbons, volatile organic compounds, and nitrates, rendering the relevant properties unsuitable for the residential development.
- The current (at the time of actual development) or former horticultural land use
Depending on the outcome of a site-specific Preliminary Site Investigation/Detailed Site Investigation, the soils within the given land may be adversely affected by elevated concentrations of arsenic and selected heavy metals, and organochlorine pesticides. In case such investigations reveal the presence of unacceptably elevated levels of contaminants, remediation of the affected sites and controlled disposal of the contaminated soil will be required.
- The current (at the time of actual development) or former use of the land for primary production
Depending on the outcome of a site-specific Preliminary Site Investigation/Detailed Site Investigation, the soils within the given land may be adversely affected by elevated concentrations of heavy metals, polycyclic aromatic hydrocarbons, or other petroleum hydrocarbons. In case such investigations reveal the presence of unacceptably elevated levels of contaminants, remediation of the affected sites and controlled disposal of the contaminated soil will be required.
- The presence of unknown potential contamination sources, such as uncertified asbestos dumps, farm dumps, rubbish/waste dumps, demolition material dumps, as well as sites affected by historical pollution incidents and fires
The actual risk associated with the above activities would need to be assessed through the process of a Preliminary Site Investigation/Detailed Site Investigation. Depending on the outcome of such investigations, the soils within the given parcel of land may be adversely affected by asbestos, landfill gas, heavy metals, polycyclic aromatic hydrocarbons, volatile organic compounds, and nitrates. Remediation of the land prior to the residential development may be required.

Recommended by the Technical Investigation Report is undertaking representative Preliminary Site Investigations/Detailed Site Investigations within the area subject to the proposed Private Plan Change, in order to confirm the contamination status of the properties in question and identify the presence of any site-specific constraints for the future development.

The above recommendation has been incorporated into the overall recommendations relevant to the proposed Private Plan Change, in Section 6.0 of this Memo.

3.0 Applicant's assessment

The Preliminary Geotechnical Report, provided in support of the request for the proposed Private Plan Change identified two specific locations of in-filled ground within the subject area. Such fill, being of unverified origin, has the potential for being contaminated. An assessment of the actual contamination status of such fill will need to be undertaken during the subsequent resource consenting and subdivision stage.

The Preliminary Geotechnical Report did not reveal any areas of concern, which might be specifically associated with the presence of hazardous materials in soil, contamination hotspots, waste dumps, or closed landfills. However, the presence of such areas at some isolated locations needs to be considered as being likely and it will need to be provided for in the site-specific Preliminary Site Investigations/Detailed Site Investigations.

The Assessment Report acknowledges that while no Preliminary Site Investigation report has been completed for the subject site, the presence of some contaminated areas and sites affected by contaminating activities, described on the Hazardous Activities and Industries

List (HAIL, Ministry for the Environment, 2011) is highly likely, and therefore relevant environmental investigations will be required at the time of future development, subdivisions, and relevant consenting process.

Furthermore, the Assessment Report states that those areas identified to be contaminated in exceedance of the relevant Soil Contaminant Standards for protection of human health, set out in the NES:CS and/or Permitted Activity soil acceptance criteria, set out in Contaminated Land Rules of the AUP(OP) will need to be remediated in accordance with the Council's requirements. The requirement for preparing relevant Remedial Action Plans for the remediation of those areas which require the removal or management of contaminated soil is provided for, as part of the future development, subdivisions, and consenting process.

The Assessment Report relies on the recommendation made within the Technical Investigation Report for undertaking representative Preliminary Site Investigations/Detailed Site Investigations within the area subject to the proposed Private Plan Change, in order to confirm the contamination status of the properties in question and identify the presence of any site-specific constraints for the future development.

The above recommendation has been incorporated into the overall recommendations relevant to the proposed Private Plan Change, in Section 6.0 of this Memo.

I consider those recommendations for further, site-specific environmental investigations of the properties within the subject area and relevant remediation (where necessary) as being satisfactory and relevant to the proposed Private Plan Change.

4.0 Assessment of the effects on human health and the environment, and management methods

The purpose of my review was to obtain an understanding of the constraints affecting the proposed Private Plan Change and the relevant future development, associated with the potential contamination of soil and groundwater within the subject area.

My review included the assessment of the reports submitted in support of the Private Plan Change request, and the compliance of the proposed Private Plan Change with the purpose of the NES:CS regulations, and the objectives and policies of the AUP(OP), Auckland Council Auckland Regional Policy Statement, and National Policy Statement for Freshwater Management, relevant to the contaminated land management.

I consider the information provided in support of the Private Plan Change request as being adequate for obtaining general understanding of the scale and significance of the adverse effects and positive effects on human health and the environment, anticipated from the implementation of the proposed Private Plan Change. While no Preliminary Site Investigation has been undertaken within the subject area to date, a general overview of the current and former land use and associated contaminating activities was included within the Technical Investigation Report. I consider it being sufficient for the purpose of this review, however the extent of the land affected by contamination, if any, will only be able to be assessed at a later stage, prior to the development and subdivision process.

I consider the proposed Private Plan Change as being generally consistent with the purpose of the NES:CS regulations, and the objectives and relevant policies of the AUP(OP), Auckland Council Auckland Regional Policy Statement, and National Policy Statement for Freshwater Management, and anticipate the land subject to the Private Plan Change as being generally suitable for the intended future residential and commercial development.

Certain parcels of the land may require remediation or long-term management, depending on their contamination status at the time of proposed development or subdivision.

Additional, site-specific Preliminary Site Investigations and Detailed Site Investigations will likely be required to determine the contamination status of the land and relevant consenting requirements. Included within such further investigations would also need to be consideration of the historical use of hazardous materials, such as lead (in lead-based paint) and asbestos (in the cladding of building structures and sheds, and in fences) within the subject area.

5.0 Submissions

I have reviewed all 44 submissions received with regards to the proposed Private Plan Change. None of the submissions expressed any concerns relevant to the potential or actual contamination of soil or groundwater within the subject area, that may affect human health or the environment as a result of the proposed Private Plan Change or the associated future development.

One submission referred to the contaminant run-off from the existing and new roads and carparks within the subject area. Relevant Submission #35, from Auckland Council, in opposition to the Private Plan Change request, expressed the submitter's concern about the currently insufficient plan for protection of the ultimate receiving environment, namely the upper Manukau Harbour from continued contaminant discharges from existing and new roads and carparks. That submission is considered to be relevant to the stormwater management and not the contaminated land management aspect, and therefore it is not further addressed in this review.

Submission #35 also expressed the submitter's concern about the cumulative contaminant loading within the receiving environment of the upper Manukau Harbour, from the discharges off the roads and building structures with exterior materials with exposed surfaces that are made from contaminants of concern, such as copper, lead, and zinc. That submission is also considered to be relevant to the stormwater management and not the contaminated land management aspect, and therefore it is not further addressed in this review.

6.0 Conclusions and recommendations

I consider the documentation provided in support of the Private Plan Change request to be sufficiently adequate to identify the relevant potential effects of the implementation of the proposed Private Plan Change on human health and the environment.

While an information gap has been identified within the reports submitted in support of the Private Plan Change request, such as lack of a Preliminary Site Investigation report, it is considered not to prevent obtaining sufficient understanding of the significance of the potential environmental effects anticipated from the implementation of the proposed Private Plan Change. Other relevant documents, such as the Assessment Report, Technical Investigation Report, and Preliminary Geotechnical Report included the high-level description of the potential contamination issues and the relevant risks.

There appear to be no significant issues of concern with regards to contamination within the subject area, that would affect the Private Plan Change in principle. However, a number of potentially contaminating land-use activities and relevant soil contaminants of concern have been identified. A recommendation has been made that further, site-specific Preliminary Site Investigations and Detailed Site Investigations be carried out prior to the consenting process, in order to assess the actual contamination status of the properties within the subject area and inform the remediation requirements.

From the perspective of contamination and the associated potential effects on human health and the environment, the proposed Private Plan Change is considered to be consistent with the purpose of the NES:CS, and relevant objectives and policies of the Contaminated Land

None of the 44 submissions received have raised an issue of concern relevant to the contamination of the soil, surface water, or groundwater, associated with the current or historical land use.

Overall, from the perspective of the current contamination status of the subject area and the potential effects on human health and the environment, I recommend that the proposed Private Plan Change be supported, subject to the following recommended actions to be taken prior to and during the residential and commercial development:

- Undertaking site-specific Preliminary Site Investigations and Detailed Site Investigations for individual parcels of land, to identify the potential risks to human health and the environment and enable to determine and implement the relevant mitigation options.
- Undertaking remediation at those parcels of land, which are found to be affected by contamination in concentrations exceeding the relevant Soil Contaminant Standards for protection of human health and/or environmental guidelines for protection of the environment.
- Implementing adequate controls, management procedures, and mitigation measures during the development of individual parcels of land, in order to protect human health and the environment.
- Adopting the proposed options to avoid, remedy, or mitigate the identified adverse effects on human health and the environment, as per recommendations made in the Technical Investigation Report.
- Monitoring of surface waters during the construction to ensure the protection of the receiving environment.

APPENDIX 5

JOINT WITNESS STATEMENTS TRANSPORT AND PLANNING

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

AND

IN THE MATTER of an application to **AUCKLAND
COUNCIL** for private plan change 51 to
the partly operative Auckland Unitary
Plan by **KARAKA AND DRURY
LIMITED**

JOINT WITNESS STATEMENT OF EXPERTS IN RELATION TO PLANNING

2 JULY 2021

Expert Witness Conferencing Topic: Planning

Held on: 2 July 2021, commencing at 9am (following transport conferencing)

Venue: Committee Room, Level 26, Auckland House, 135 Albert Street, Auckland Central

Independent Facilitator: Marlene Oliver

Admin Support: Anika Norton

1. **ATTENDANCE**

1.1 The list of expert attendees is in the signatory schedule to this Statement. All expert attendees are qualified planners.

2. **BASIS OF ATTENDANCE AND ENVIRONMENT COURT PRACTICE NOTE 2014**

2.1 All participants agree as follows:

- (a) The Environment Court Practice Note 2014 provides relevant guidance and protocols for the expert conferencing session.
- (b) They will comply with the relevant provisions of the Environment Court Practice Note 2014.
- (c) The Auckland Council (as regulator) participants attended as observers, given their role as section 42A reporters.
- (d) They will make themselves available to appear at the hearing in person if required to do so by the Hearing Panel (as directed by the Hearing Panel's directions).
- (e) This report is to be filed with the Hearing Panel.

2.2 Given the timing of the caucusing, the experts for Auckland Transport and Auckland Council (as submitter) wish to record that they are only able to participate at a high level and on the basis that they may not be able to comment on specific provisions at this stage of the process.

2.3 Auckland Transport's planner, Karyn Sinclair, was unable to attend conferencing on 2 July 2021, being the second day that had originally been scheduled for conferencing. An Auckland Transport representative (Rebecca Phillips) attended in her place as an observer. Ms Phillips will not be giving evidence and cannot express any opinion on behalf of Ms Sinclair.

2.4 Similarly, Auckland Council (as submitter) stormwater planner, Paula Vincent, was unable to attend conferencing on 2 July 2021.

3. **AGENDA – ISSUES CONSIDERED AT CONFERENCING**

3.1 The issues identified as forming the agenda for conferencing were:

- (a) Applicability of the NPS:UD 2020;
- (b) E26 vs departures from AUP wide rules relating to infrastructure;
 - (i) Firstgas pipeline protection
 - (ii) Submissions from Spark and Counties Power are unclear and accordingly Mark Tollemache to contact these parties for further information.
- (c) Location of Drury West centre;
- (d) Size of Drury West centre;
- (e) Sufficiency of infrastructure provision/servicing;*
- (f) Use of transport triggers;*
- (g) Acoustic attenuation and vibration effects arising from SH22 (Town Centre and THAB zones)
- (h) Stormwater;
- (i) Open space provision and approach;
- (j) Intensification, particularly sought by Kainga Ora;
- (k) Educational facilities;
- (l) Submitters outside the plan change seeking to be included;
- (m) Key retail frontage and general commercial frontage; and
- (n) Submissions relating to mana whenua matters.

3.2 The issues marked * above were also considered in the expert witness conferencing on transport matters, held immediately prior to the planning conferencing. They were therefore only addressed further in the planning conferencing as required, in light of the outcomes from the transport conferencing.

3.3 The following sections of this Joint Witness Statement address each of these issues or questions, noting where agreement has been reached and, in the event of disagreement, the nature of the disagreement and the reasons for that disagreement.

4. **ISSUE ONE: APPLICABILITY OF THE NPS:UD 2020**

- 4.1 All agree – submissions and evidence will acknowledge the latest case law at the time of the hearing. Currently the latest case law is Environment Court Decision [2021] NZEnvC 082. This item will be reconsidered on the agenda for expert conferencing on the 10th August 2021.

5. **ISSUE TWO: E26 VS DEPARTURES FROM AUP WIDE RULES RELATING TO INFRASTRUCTURE**

- 5.1 **Note:** This issue relates to the several submission points which seek more onerous or additional requirements to those imposed by the AUP's Auckland-wide rules.

5.2 **Firstgas pipeline**

Mark Tollemache to circulate a package to address the concerns of Firstgas (submitter) and to be circulated to all parties, particularly Auckland Council (submitter), Kainga Ora (submitter), Auckland Transport and Auckland Council (regulator), with the intention of finalising a JWS on the 10th August 2021.

6. **ISSUE THREE: LOCATION OF DRURY WEST CENTRE**

- 6.1 **Note:** This issue is to include discussion of the relevant principles guiding urban growth and centres strategy from the NPS:UD, AUP and Drury-Opaheke Structure Plan provisions.

- 6.2 Note: There was no discussion on this item because there were no submitters in opposition to the Plan Change as notified present.

7. **ISSUE FOUR: SIZE OF DRURY WEST CENTRE**

- 7.1 **Note:** This issue is to include discussion of whether the Drury West centre should be a Town Centre or Local Centre, as well as the height variation controls requested by the PC51 applicant.

- 7.2 Sukhi Singh (Waka Kotahi) reserves position on this topic until the revised ITA is available.

8. **ISSUE FIVE: SUFFICIENCY OF INFRASTRUCTURE PROVISION/SERVICING**

- 8.1 **Note:** Issues regarding sufficiency of transport infrastructure will have been addressed at the transport conferencing. So this discussion is expected to focus on the remaining infrastructure provision issues (including those raised by FirstGas, Spark, Counties Power and Watercare) – noting there is a specific item for stormwater issues included below.

- 8.2 Note: Mark Tollemache to contact Watercare representatives to discuss their submission.

9. **ISSUE SIX: USE OF TRANSPORT TRIGGERS**

- 9.1 Refer to JWS – Transport 2 July 2021.

10. **ISSUE SEVEN: ACOUSTIC ATTENUATION AND VIBRATION EFFECTS ARISING FROM SH22 (TOWN CENTRE AND THAB ZONES)**

- 10.1 Sukhi Singh (Waka Kotahi) advised that Waka Kotahi has carried out further research on the likely noise effects arising from SH22 and further work including section 32 – type analysis is being undertaken. In essence Waka Kotahi is seeking acoustic and

vibration mitigation measures to be incorporated in the noise impacted areas of the Plan Change development areas.

10.2 Mark Tollemache expressed concern that PC51 was being treated differently than Auckland wide development adjoining state highways commenting that these matters had been addressed in AUP hearings. Vijay Lala has similar concerns where this issue also effects PC61.

10.3 The experts for the above parties (and any other submitters or further submitters) to have further discussions. Waka Kotahi to initiate these discussions. An update to be provided the 10th August 2021.

11. **ISSUE EIGHT: STORMWATER**

11.1 Note: The PC51 experts have circulated revised provisions relating to stormwater Healthy Waters (Paula Vincent). Mark Tollemache to follow up with a view to preparing a specific JWS.

12. **ISSUE NINE: OPEN SPACE PROVISION AND APPROACH**

12.1 All agreed – the wording on the Precinct Plan to read “Indicative Open Space/Esplanade Reserve.”

12.2 Mark Tollemache to consider a way of providing for indicative civic open space adjacent to the lake. To be discussed at expert conferencing 10th August 2021.

12.3 Bluegreen corridors – in discussion around this topic Mark Tollemache suggested that a cycling/pedestrian route adjoining the Ngakaroa Stream could be included in the Precinct Plan. This topic to be discussed at expert conferencing on 10th August 2021. Chris Turbott to coordinate and precirculate on the agenda further notes.

13. **ISSUE TEN: INTENSIFICATION, PARTICULARLY SOUGHT BY KAINGA ORA**

13.1 Mark Thode (Kainga Ora) noted that the original submission was based on the interpretation of the NPS:UD prior to the recent Environment Court Decision [2021] NZEnvC 082 and the previous location of the railway station. At this time the Kainga Ora submission is still alive (in relation to additional height in the THAB Zone). This matter is scheduled on the agenda for expert conferencing on the 10th August 2021 – Mark Thode to prepare notes for discussion, to be precirculated with the agenda.

13.2 Mark Tollemache to ensure Leo Hills traffic assessments confirms assumptions includes the basis used for the THAB zoning.

14. **ISSUE ELEVEN: EDUCATIONAL FACILITIES**

14.1 Note: Mark Tollemache to contact Ministry of Education representatives to discuss their submission.

15. **ISSUE TWELVE: SUBMITTERS SEEKING INCLUSION IN PLAN CHANGE**

15.1 **Note:** This issue is to include discussion as appropriate/necessary regarding the various requests for additional land to be included in PC51.

15.2 Mark Thode (Kainga Ora) confirmed that Kainga Ora had withdrawn this part of this submission.

16. **ISSUE THIRTEEN: KEY RETAIL FRONTAGE AND GENERAL COMMERCIAL FRONTAGE**

16.1 Mark Tollemache to circulate provisions relating to AK Council (submitter) submission point 35.20 (amenity standards on specified roads).

17. **ISSUE FOURTEEN: SUBMISSIONS RELATING TO MANA WHENUA MATTERS**

17.1 Mark Tollemache to review Plan Changes 43, 48 and 61, as examples, in terms of mana whenua provisions to incorporate into PC51.

18. **PARTIES TO JOINT WITNESS STATEMENT**

18.1 The signatories to this Joint Witness Statement confirm that:

(a) They agree with the outcome of the expert conference as recorded in this statement to the extent that they participated in the agenda items, noting:

(i) Graeme Roberts (Firstgas) – item 5.2 only.

(ii) Mark Thode (Kainga Ora) – items 4.1, 13.1 and 15.2.

(iii) Craig Cairncross (Auckland Council, regulator) – items 4.1, 5.2, 13.1 and 15.2.

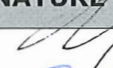
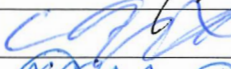



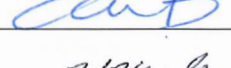
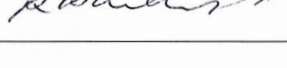




(iv) Ezra Barwall (Auckland Council, submitter) – item 12.

(v) Dawne Mackay (Auckland Council, submitter) – attended as an observer.

(b) They have read Appendix 3 of the Environment Court's Practice Note 2014 and agree to comply with it; and

(c) The matters addressed in this statement are within their area of expertise.

SIGNED ON 2 JULY 2021

EXPERT NAME	PARTY	SIGNATURE
Mark Tollemache	Karaka and Drury Limited	
Christopher Turbott	Auckland Council (as submitter)	
Dawne Mackay	Auckland Council (as submitter)	
Ezra Barwell	Auckland Council (as submitter)	
Craig Cairncross	Auckland Council (as regulator)	
David Mead	Auckland Council (as regulator)	
Emily Buckingham	Auckland Council (as regulator)	
Rebecca Phillips (refer paragraph 2.3 above)	Auckland Transport	
Jo Michalakis	Counties Power	
Graeme Roberts - attended for item 5.2 only	FirstGas	
Mark Thode	Kainga Ora	
Michael Campbell	Kainga Ora	
Vijay Lala	Lomai Properties Limited	
Matt Feary	Catholic Diocese of Auckland	
Sukhi Singh	Waka Kotahi	

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

AND

IN THE MATTER of an application to **AUCKLAND
COUNCIL** for private plan change 51 to
the partly operative Auckland Unitary
Plan by **KARAKA AND DRURY
LIMITED**

**JOINT WITNESS STATEMENT OF EXPERTS IN RELATION TO TRANSPORT
AND PLANNING**

2 JULY 2021

Expert Witness Conferencing Topic: Transport and Planning

Held on: 2 July 2021, commencing at 9am

Venue: Committee Room, Level 26, Auckland House, 135 Albert Street, Auckland Central

Independent Facilitator: Marlene Oliver

Admin Support: Anika Norton

1. **ATTENDANCE**

1.1 The list of expert attendees is in the signatory schedule to this Statement. Their area of expertise (transport (T) or planning (P)) is also indicated in that schedule.

2. **BASIS OF ATTENDANCE AND ENVIRONMENT COURT PRACTICE NOTE 2014**

2.1 All participants agree as follows:

- 1) The Environment Court Practice Note 2014 provides relevant guidance and protocols for the expert conferencing session.
- 2) They will comply with the relevant provisions of the Environment Court Practice Note 2014.
- 3) The Auckland Council (as regulator) participants attended as observers, given their role as section 42A reporters.
- 4) They will make themselves available to appear at the hearing in person if required to do so by the Hearing Panel (as directed by the Hearing Panel's directions).
- 5) This report is to be filed with the Hearing Panel.

2.2 Given the timing of the caucusing, the experts for Auckland Transport and Auckland Council (as submitter) wish to record that they are only able to participate at a high level and on the basis that they may not be able to comment on specific provisions at this stage of the process.

2.3 Auckland Transport's planner, Karyn Sinclair, was unable to attend conferencing on 2 July 2021, being the second day that had originally been scheduled for conferencing. An Auckland Transport representative (Rebecca Phillips) attended in her place as an observer. Ms Phillips will not be giving evidence and cannot express any opinion on behalf of Ms Sinclair.

2.4 Similarly, Auckland Council (as submitter) stormwater planner, Paula Vincent, was unable to attend conferencing on 2 July 2021.

3. **AGENDA – ISSUES CONSIDERED AT CONFERENCING**

3.1 The issues identified as forming the agenda for conferencing were:

- 1) Sufficiency of transport infrastructure;
- 2) Use of transport triggers; and
- 3) Potential changes to Drury 2 Precinct provisions proposed by KDL in response to submissions, as shown in the amended provisions **attached** as **Annexure 1**.

3.2 The following sections of this Joint Witness Statement address each of these issues or questions, noting where agreement has been reached and, in the event of disagreement, the nature of the disagreement and the reasons for that disagreement.

4. **ISSUE ONE: UPDATED ITA**

4.1 **All agreed – there is a need for an updated ITA, including:**

- 1) Updated trip generation assessments/assumptions. This to include assumptions around employment and local trip generation; and future infrastructure staging.

(Leo Hills to provide to Julie McKee by 3pm, Wednesday 7th July 2021. Julie to circulate to all parties. Parties to respond to Julie by the 14th July 2021. Note: these admin procedures may be modified by Julie at her discretion).

- 2) Intersection assessment for the base year and future year assessments (Access SH22 and internal collector network within the PC area).

(i) Sequencing and analysis of intersections (including: SH22/realigned Burberry/Mcpherson Road, SH22/Main Street, SH22/Great South Road).

(ii) This should include the quantification of additional trips on the northern on ramp of Drury interchange, not including modelling.

(iii) Burberry road/SH22 should be closed prior to any development out of the capital PC area.

(iv) Confirmation of functionality within the PC area.

- 3) The design of intersections on SH22 and their safe and efficient operations.

- 4) All agreed there is a need for a revision and update of the public transport/cycling/walking network taking into account the proposed location of the railway station(s).
- 5) Timeframe for items 2,3 and 4 above – Leo Hills to report by 30th of July 2021. Subsequent expert conferencing session for transport and planning (optional) experts is scheduled for 10th August 2021. Details set out in item 5.1 below.

4.2 **Design SH22**

- 4.3 All agreed that Leo Hills will provide further information of the design of SH22 (including intersections) with and without mid-block four lanes. To the extent of the design to be between Jesmond Road and SH1 interchange.

5. **ISSUE TWO: USE OF TRANSPORT AND STAGING TRIGGERS, AND POTENTIAL CHANGES TO DRURY 2 PRECINCT PROVISIONS**

- 5.1 Mark Tollemache to circulate a redrafting of proposed planning provisions relating to this issue by 16 July 2021. Planning experts to meet informally to discuss on 23rd July 2021 (commencing 9.30am at level 28 AK Council Building). Formal expert conferencing is scheduled for 10th August 2021 (commencing 9am at the Reception Lounge, Town Hall). (Confirmation of both sessions by Julie McKee).




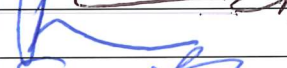


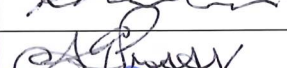


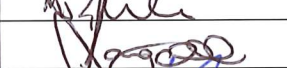

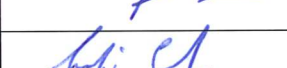





6. **FURTHER EXPERT CONFERENCING**

- 6.1 All agree that the expert conferencing sessions scheduled for 10th August can be used to discuss any other planning matters that can be resolved between the experts. Accordingly, any expert can submit material for the agenda of that meeting.
- 6.2 All agree that there will be benefit in further expert conferencing during the processing of this plan change prior to the closing of the hearing. The parties will recommend further sessions.

7. **PARTIES TO JOINT WITNESS STATEMENT**

- 7.1 The signatories to this Joint Witness Statement confirm that:
 - 1) They agree with the outcome of the expert conference as recorded in this statement;
 - 2) They have read Appendix 3 of the Environment Court's Practice Note 2014 and agree to comply with it; and
 - 3) The matters addressed in this statement are within their area of expertise.

SIGNED ON 2 JULY 2021

EXPERT NAME	PARTY	SIGNATURE
Mark Tollemache (P)	Karaka and Drury Limited	
Leo Hills (T)	Karaka and Drury Limited	
Christopher Turbott (P)	Auckland Council (as submitter)	
Ezra Barwell (P)	Auckland Council (as submitter)	
Craig Cairncross (P)	Auckland Council (as regulator)	
Emily Buckingham (P)	Auckland Council (as regulator)	
Mat Collins (T)	Auckland Council (as regulator)	
Rebecca Phillips (P) (refer to paragraph 2.3 above)	Auckland Transport	
Andrew Prosser (T)	Auckland Transport	
Joe Phillips (T)	Drury South Limited	
Graeme Roberts (P)	FirstGas	
Mark Thode (P)	Kainga Ora	
Todd Langwell (T)	Kainga Ora	
Vijay Lala (P)	Lomai Properties Limited	
Matt Feary (P)	Catholic Diocese of Auckland	
Sukhi Singh (P)	Waka Kotahi	
Geoff Prince (T)	Waka Kotahi	

APPENDIX 6

**RELEVANT POLICY AND STATUTORY
FRAMEWORK**

Appendix 6 – Relevant Policy and Statutory Framework

This appendix contains relevant statutory and policy framework.

National policy statements

The relevant national policy statements (NPS) must be given effect to in the preparation of the proposed plan change, and in considering submissions on PPC51. In respect of the NPS-UD, instead of giving effect to, the plan change should at least have regard to the objectives and policies that do not refer to 'planning decisions'. Table 1 below summarises the NPS that apply to PPC51.

Table 1 National Policy Statements relevant to PPC51

Relevant Act/ Policy/ Plan	Section	Matters
National Policy Statement on Freshwater Management (NPS-FM) 2020	Part 2 Objective and policies	Give effect to Te Mana o te Wai in the management of fresh water.
		Manage freshwater in an integrated way considering the effects of the use and development of land on a whole-of-catchment basis, including effects on receiving environments.
		Ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.
		Protect and restore natural inland wetlands, and avoid the loss of river extent and values to the extent practicable.
		Protect habitats of indigenous freshwater species.
		Provide for social, economic and cultural wellbeing in a way that is consistent with the NPS-FM.
National Policy Statement on Urban Development 2020 (NPS-UD)	Well-functioning urban environments, competitive land and development markets, and climate change Objectives 1, 2 and 8, Policy 1	Planning decisions contribute to well-functioning urban environments that enable a variety of homes and business sites, have good accessibility, support the competitive operation of land and development markets, support reductions in greenhouse gas emissions, are resilient to effects of climate change.
	Providing development capacity Objectives 3 and 7, Policy 2 and 7 / clauses 3.2 – 3.7	Auckland Council as a Tier 1 local authority, at all times, is to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. Sufficient development capacity is plan-enabled and infrastructure-ready, feasible / suitable.
	Intensification requirements Objective 3, Policies 3-4, clauses 3.31-3.34	Auckland Council as a Tier 1 local authority must enable intensification close to centres and places well-served by public transport, including at least 6 storey buildings within walkable catchments of rapid transit stops, unless qualifying matters apply.
	Responsive planning Objective 6(c), Policy 8 / Clause 3.8	Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.
	Objective 4	New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.
	Objective 5, Policy 9	Planning decisions relating to urban environments take into account the principles of Te Tiriti o Waitangi.

Relevant Act/ Policy/ Plan	Section	Matters
	Objective 6	Local authority decisions on urban development that affect urban environments are: <ul style="list-style-type: none"> (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.
	Policy 6	When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: <ul style="list-style-type: none"> (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: <ul style="list-style-type: none"> (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity (e) the likely current and future effects of climate change.
New Zealand Coastal Policy Statement	Objective 1, Policy 4, Policy 22, Policy 23	Maintain coastal water quality through considering land use activities that could affect water quality by increasing sedimentation. Reduce contaminant and sediment loadings in runoff and in stormwater systems by controlling land use activities.

National environmental standards or regulations

Under section 44A of the RMA, local authorities must observe national environmental standards (NES) in its district/ region. No rule or provision may be duplicated or in conflict with a national environmental standard or regulation.

Table 2 below summarises the NES relevant to PPC51.

Table 2 National environmental standards and regulations relevant to PPC51

Relevant Act/ Policy/ Plan	Matters	Comment
National Environmental Standard on assessing and managing contaminants into soil to protect human health (NES-CS)	The National Environmental Standard on assessing and managing contaminants into soil to protect human health applies a nationally consistent framework for assessing subdivision, development and use on land that is contaminated or potentially contaminated.	No Preliminary Site Investigation has been provided as part of the plan change material but investigations were done as part of the structure plan. There is nothing to indicate that the plan change area is unsuitable for future urban development. Should the plan change be approved, future detailed investigations and resource consents may be required under this national environmental standard.

Relevant Act/ Policy/ Plan	Matters	Comment
National Environmental Standards for Freshwater 2020 (NES-FW)	The NES for Freshwater regulates activities that pose risks to the health of freshwater and freshwater ecosystems. Relevant to urban development these include activities affecting natural wetlands and reclamation/ culverting of streams.	One wetland has been identified within the plan change area. This will need specific assessment at earthworks resource consent stage. Resource consents will also be required for any reclamation of streams and culverts that do not meet the conditions under the NES for Freshwater. These matters do not preclude the plan change as a whole.
National Environmental Standard on Sources of Drinking Water	The NES for Sources of Drinking Water sets requirements for protecting sources of human drinking water from becoming contaminated. It is intended to reduce the risk of contaminants entering natural water bodies such as lake, river or ground water.	No sources of human drinking water have been identified within or nearby the plan change area. At earthworks resource consent stage, erosion and sediment controls would be required in accordance with industry best practices and resource consent requirements, to protect against contaminants entering water bodies.

Auckland Unitary Plan

Section 75(3)(c) of the RMA requires that a district plan must give effect to any regional policy statement (RPS).

Table 3 below summarises the RPS objectives and policies that I consider are particularly pertinent to this plan change request.

Table 3 Relevant regional policy statement provisions of Auckland Unitary Plan

Section	Matters
Urban Growth Objective B2.2.1(1) Policies B2.2.2(3), (5), (6), (7)	<p>B2.2.1(1) A quality compact urban form that enables all of the following:</p> <ul style="list-style-type: none"> (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 and more effective public transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; and (g) reduced adverse environmental effects. <p>B2.2.2(3) Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines</p> <p>B2.2.2(5) Enable higher residential intensification:</p> <ul style="list-style-type: none"> (a) in and around centres; (b) along identified corridors; and (c) close to public transport, social facilities (including open space) and employment opportunities. <p>(6) Identify a hierarchy of centres that supports a quality compact urban form:</p> <ul style="list-style-type: none"> (a) at a regional level through the city centre, metropolitan centres and town centres which function as commercial, cultural and social focal points for the region or sub-regions; and (b) at a local level through local and neighbourhood centres that provide for a range of activities to support and serve as focal points for their local communities.

Section	Matters
	<p>(7) 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:</p> <ul style="list-style-type: none"> (a) support a quality compact urban form; (b) provide for a range of housing types and employment choices for the area; (c) integrate with the provision of infrastructure; and (d) follow the structure plan guidelines as set out in Appendix 1.
<p>Quality Built Environment Objective B2.3.1(1) Policy B2.3.2(2)</p>	<p>B2.3.1(1) A quality built environment where subdivision, use and development do all of the following:</p> <ul style="list-style-type: none"> (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. <p>B2.3.2(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:</p> <ul style="list-style-type: none"> (a) providing access for people of all ages and abilities; (b) enabling walking, cycling and public transport and minimising vehicle movements; and (c) minimising the adverse effects of discharges of contaminants from land use activities (including transport effects) and subdivision.
<p>Residential growth Objectives B2.4.1 (1) and (3) Policies B2.4.2(2)-(4), (6)</p>	<p>B2.4.1(1) Residential intensification supports a quality compact urban form.</p> <p>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.</p> <p>B2.4.2 (2) Enable higher residential intensities in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space.</p> <p>B2.4.2 (3) Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.</p> <p>B2.4.2(6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.</p>
<p>Commercial and industrial growth Objectives B2.5.1(1) and (2) Policy B2.5.2(4)</p>	<p>B2.5.1(1) Employment and commercial and industrial opportunities meet current and future demands.</p> <p>B2.5.1(2) Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that supports a compact urban form.</p> <p>B2.5.2(4) Enable new town centres through structure planning and plan change process having regard to:</p> <ul style="list-style-type: none"> (a) the proximity of the new centre to existing or planned medium to high intensity residential development; (b) the existing network of centres and whether there will be sufficient population growth to achieve a sustainable distribution of centres; (c) whether the new centre will avoid or minimise adverse effects on the function, role and amenity of the city centre, metropolitan and town centres, beyond those effects ordinarily associated with trade effects on trade competitors; (d) the form and role of the proposed centre; (e) any significant adverse effects on existing and planned infrastructure; (f) a safe and efficient transport system which is integrated with the centre; and (g) any significant adverse effects on the environment or on natural and physical resources that have been scheduled in the Unitary Plan in relation to

Section	Matters
	natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character.
Open Space and recreation facilities Objective B2.7.1(1), (2) Policies B2.7.2(2), (3), (9)	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. B2.7.1(2) Public access to and along Auckland's coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced. B2.7.2 (2) Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely. B2.7.2 (3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities B2.7.2 (9) Enable public access to lakes, rivers, streams, wetlands and the coastal marine area by enabling public facilities and by seeking agreements with private landowners where appropriate
Infrastructure Objectives B3.2.1(5), (6) Policy B3.2.2(5)	B3.2.1(5) Infrastructure planning and land use planning are integrated to service growth efficiently. B3.2.1(6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development. B3.2.2(5) Ensure subdivision, use and development do not occur in a location or form that constrains the development, operation, maintenance and upgrading of existing and planned infrastructure.
Transport Objective B3.3.1(1) Policy 3.3.2(5), (6)	B3.3.1(1) Effective, efficient and safe transport that: (a) supports the movement of people, goods and services; (b) integrates with and supports a quality compact urban form; (c) enables growth; (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community. B3.3.2(5) Improve the integration of land use and transport by: (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth; (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods; (c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes (d) requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network; (e) enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure. B3.3.2(6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects.
Notable trees Objective B4.5.1 Policies B4.5.2(1)-(4)	B4.5.1(1) Notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained. B4.5.2(1)-(4) [Factors to be considered in identifying notable trees include whether the trees provide a critical habitat for a threatened species population.]
Historic heritage and special character Objective B5.2.1(1) Policy B5.2.2(1)	B5.2.1(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development. B5.2.2(1) [the criteria for identifying and evaluating a place with historic heritage value]

Section	Matters
Recognition of Te Titiri o Waitangi partnerships and participation Objective B6.2.1(1), (2) Policy B6.2.2(1)	Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga
Recognising Mana Whenua values Objective B6.3.1(1), (2) Policy B6.3.2(1), (2)	<p>B6.3.1(1) Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision-making.</p> <p>B6.3.1(2) The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall.</p> <p>B6.3.2(1) Enable Mana Whenua to identify their values associated with all of the following:</p> <ul style="list-style-type: none"> (a) ancestral lands, water, air, sites, wāhi tapu, and other taonga; (b) freshwater, including rivers, streams, aquifers, lakes, wetlands, and associated values; (c) biodiversity; (d) historic heritage places and areas; and (e) air, geothermal and coastal resources. <p>B6.3.2(2) Integrate Mana Whenua values, mātauranga and tikanga:</p> <ul style="list-style-type: none"> (a) in the management of natural and physical resources within the ancestral rohe of Mana Whenua, including: <ul style="list-style-type: none"> (i) ancestral lands, water, sites, wāhi tapu and other taonga; (ii) biodiversity; and (iii) historic heritage places and areas. (b) in the management of freshwater and coastal resources, such as the use of rāhui to enhance ecosystem health; (c) in the development of innovative solutions to remedy the long-term adverse effects on historical, cultural and spiritual values from discharges to freshwater and coastal water; and (d) in resource management processes and decisions relating to freshwater, geothermal, land, air and coastal resources.
Indigenous biodiversity Objective B7.2.1(2)	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.
Freshwater systems Objectives B7.3(1)-(3) Policies B7.3.2(1), (6)	<p>B7.3.1(1) Degraded freshwater systems are enhanced.</p> <p>B7.3.1(2) Loss of freshwater systems is minimised.</p> <p>B7.3.1(3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.</p> <p>B7.3.2(1) Integrate the management of subdivision, use and development and freshwater systems by undertaking all of the following:</p> <ul style="list-style-type: none"> (a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of new growth or intensification; (b) ensuring catchment management plans form part of the structure planning process; (c) controlling the use of land and discharges to minimise the adverse effects of runoff on freshwater systems and progressively reduce existing adverse effects where those systems or water are degraded; and (d) avoiding development where it will significantly increase adverse effects on freshwater systems, unless these adverse effects can be adequately mitigated. <p>B7.3.2(6) Restore and enhance freshwater systems where practicable when development, change of land use, and subdivision occur.</p>
Coastal water, freshwater and geothermal water Objectives B7.4.1(2), (5) Policies B7.4.2(1), (9)	<p>B7.4.1(2) The quality of freshwater and coastal water is maintained where it is excellent or good and progressively improved over time where it is degraded.</p> <p>B7.4.1(5) The adverse effects from changes in or intensification of land use on coastal water and freshwater quality are avoided, remedied or mitigated.</p> <p>B7.4.2(1) Integrate the management of subdivision, use, development and coastal water and freshwater, by:</p>

Section	Matters
	<p>(a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of growth; and</p> <p>(b) requiring catchment management planning as part of structure planning;</p> <p>(c) controlling the use of land and discharges to minimise the adverse effects of runoff on water and progressively reduce existing adverse effects where those water are degraded; and</p> <p>(d) avoiding development where it will significantly increase adverse effects on water, unless these adverse effects can be adequately mitigated.</p> <p>B7.4.2(9) Manage stormwater by all of the following:</p> <p>(a) requiring subdivision, use and development to: (i) minimise the generation and discharge of contaminants; and (ii) minimise adverse effects on freshwater and coastal water and the capacity of the stormwater network;</p> <p>(b) adopting the best practicable option for every stormwater diversion and discharge; and</p> <p>(c) controlling the diversion and discharge of stormwater outside of areas serviced by a public stormwater network.</p>

Section 75(4)(b) of the RMA requires that a district plan must not be inconsistent with a regional plan. Section 75(1)(b) and section 32(1)(b) state that policies and methods should implement the plan's objectives and policies and be the most appropriate way of achieving the objectives.

Table 4 below summarises the regional plan and Auckland wide/zone objectives and policies that I consider are particularly pertinent to this plan change request.

Table 4 Relevant regional, Auckland-wide and zone provisions of Auckland Unitary Plan

Section	Matters
Chapter E1 Water quality and integrated management Objective E1.2(1) [rp] Policy E1.3(8) [rp]	<p>E1.2(1) Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.</p> <p>E1.3(8) Avoid as far as practicable, or otherwise minimise or mitigate, adverse effects of stormwater runoff from greenfield development on freshwater systems, freshwater and coastal water, by:</p> <p>(a) taking an integrated stormwater management approach (refer to Policy E1.3.10);</p> <p>(b) minimising the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads and into sensitive receiving environments;</p> <p>...</p>
Chapter E3 Lakes, rivers, streams, wetlands Objective E3.2(2) [rp]	E3.2(2) Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.
Chapter E10 Stormwater management area – Flow 1 and Flow 2 Objective E10.2(1) [rp]	B10.2 (1) High value rivers, streams and aquatic biodiversity in identified urbanised catchments are protected from further adverse effects of stormwater runoff associated with urban development and where possible enhanced.
Chapter E15 Vegetation management and biodiversity Objective E15.2(2) [rp]	E15.2 (2) Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.
Chapter E25 Noise and vibration Objectives E25.2(1)-(3) Policy E25.3(7)	<p>E25.2 (1) People are protected from unreasonable levels of noise and vibration.</p> <p>E25.2 (2) The amenity values of residential zones are protected from unreasonable noise and vibration, particularly at night.</p> <p>E25.2 (3) Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.</p>

Section	Matters
	<p>E25.3(7) Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on:</p> <p>(a) existing or authorised infrastructure;</p>
<p>Chapter E26 Infrastructure Objective E26.2.1(6) Policy E26.2.2(3)</p>	<p>E26.2.1(6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.</p> <p>E26.2.2(3) Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.</p>
<p>Chapter E27 Transport Objectives E27.2(1), (2)</p>	<p>E27.2(1) Land use and all modes of transport are integrated in a manner that enables:</p> <p>(a) the benefits of an integrated transport network to be realised; and</p> <p>(b) the adverse effects of traffic generation on the transport network to be managed.</p> <p>E27.2(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.</p>
<p>Chapter E36 Natural Hazards and Flooding Objective E36.2(2) Policies E36.3 (32), (33)</p>	<p>E36.2(2) Subdivision, use and development, including redevelopment in urban areas, only occurs where the risks of adverse effects from natural hazards to people, buildings, infrastructure and the environment are not increased overall and where practicable are reduced, taking into account the likely long term effects of climate change.</p> <p>E36.3(32) Require risk assessment prior to subdivision, use and development of land subject to instability.</p> <p>E36.3(33) Locate and design subdivision, use and development first to avoid potential adverse effects arising from risks due to land instability hazards, and, if avoidance is not practicably able to be totally achieved, otherwise to remedy or mitigate residual risks and effects to people, property and the environment resulting from those hazards.</p>
<p>Chapter E38 Subdivision – Urban Objective E38.2(4) Policies E38.3(18), (19), (24)</p>	<p>E38.2(4) Infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner and provided for to be in place at the time of the subdivision or development.</p> <p>E38.3(18) Require subdivision to provide for the recreation and amenity needs of residents by:</p> <p>(a) providing open spaces which are prominent and accessible by pedestrians;</p> <p>(b) providing for the number and size of open spaces in proportion to the future density of the neighbourhood; and</p> <p>(c) providing for pedestrian and/or cycle linkages.</p> <p>(19) Require subdivision to provide servicing:</p> <p>(a) to be coordinated, integrated and compatible with the existing infrastructure network;</p> <p>(b) to enable the existing network to be expanded or extended to adjacent land where that land is zoned for urban development; and</p> <p>(c) to enable electricity and telecommunications services to be reticulated underground to each site wherever practicable.</p> <p>(24) Require esplanade reserves or strips when subdividing land adjoining the coast and other qualifying water-bodies.</p>
<p>Chapter H10 Business – Town Centre Zone Objectives H10.2(1), (5) for all centres and (6)-(9) for town centres Policies H10.3(13) for all centres and H10.3(15) for town centres</p>	<p>H10.2(1) 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.</p> <p>H10.2(5) A network of centres that provides:</p> <p>(a) a framework and context to the functioning of the urban area and its transport network, recognising:</p> <p>(i) 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; and</p>

Section	Matters
	<p>(ii) local centres and neighbourhood centres in their role to provide for a range of convenience activities to support and serve as focal points for their local communities.</p> <p>(b) a clear framework within which public and private investment can be prioritised and made; and</p> <p>(c) a basis for regeneration and intensification initiatives.</p> <p>Business Town Centre Zone objectives</p> <p>H10.2(6) Town centres are the focus of commercial, community and civic activities for the surrounding area and which provide for residential intensification.</p> <p>H10.2(7) The scale and intensity of development in town centres is increased while ensuring development is in keeping with the planning and design outcomes identified in this Plan for the relevant centre.</p> <p>H10.2(8) Town centres are an attractive place to live, work and visit with vibrant and vital commercial, entertainment and retail areas.</p> <p>H10.2(9) Key Retail Frontage streets are a focus for pedestrian activity, with General Commercial Frontage streets supporting this role.</p> <p>H10.3(13) In identified locations within the centres zones, Business – Mixed Use Zone, Business – General Business Zone and Business – Business Park Zone enable greater building height than the standard zone height, having regard to whether the greater height:</p> <p>(a) is an efficient use of land;</p> <p>(b) supports public transport, community infrastructure and contributes to centre vitality and vibrancy;</p> <p>(c) considering the size and depth of the area, can be accommodated without significant adverse effects on adjacent residential zones; and</p> <p>(d) is supported by the status of the centre in the centres hierarchy, or is adjacent to such a centre.</p> <p>H10.2(15) Provide for town centres including new town centres of different scales and locations, that:</p> <p>(a) service the surrounding community's needs for a range of uses, such as commercial, leisure, tourist, cultural, community and civic activities; and</p> <p>(b) support a range of transport modes including, public transport, pedestrian and cycle networks and the ability to change transport modes.</p>

The Auckland Plan

510. Section 74(2)(b)(i) of the RMA requires that in considering a plan change, a territorial authority must have regard to plans and strategies prepared under other Acts.
511. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that council should have regard to in considering PPC51, pursuant to section 74(2)(b) of the RMA.
512. Table 5 summarises the relevant sections of the Auckland Plan to PPC51.

Table 5 Relevant sections of the Auckland Plan

Section	Matters
Belonging and participation	Foster and inclusive Auckland where everyone belongs (Direction 1) Improve health and wellbeing for all Aucklanders by reducing harm and disparities in opportunities (Direction 2) Provide accessible services and social and cultural infrastructure that are responsive in meeting people's evolving needs (Focus area 2)
Maori identity and wellbeing	Recognise and provide for Te Tiriti o Waitangi outcomes (Direction 3)
Homes and places	Develop a quality compact urban form to accommodate Auckland's growth (Direction 1)

	<p>Accelerate the construction homes that meets Aucklanders' changing needs and preferences (Direction 2)</p> <p>Provide sufficient public places and spaces that are inclusive, accessible and contribute to urban living (Direction 4)</p> <p>Accelerate quality development at scale that improves housing choices (Focus area 1). With a fundamental requirement for long-term success including 'making the right decision about development location and sequencing and 'coordinating investment in infrastructure'.</p> <p>Create urban spaces for the future, focusing investment in areas of highest population density and greatest need (Focus area 5)</p>
Transport and access	<p>Better connect people, places, goods and services (Direction 1)</p> <p>Increase genuine travel choices for a healthy, vibrant and equitable Auckland (Direction 2)</p> <p>Maximise safety and environmental protection (Direction 3)</p> <p>Target new transport investment to the most significant challenges (Focus Area 2)</p> <p>Make walking, cycling and public transport preferred choices for many more Aucklanders (Focus area 4)</p> <p>Better integrate land-use and transport (Focus area 5)</p> <p>Develop a sustainable and resilient transport system (Focus area 7)</p>
Environment and cultural heritage	<p>Ensure Auckland's natural environment is valued and cared for (Direction 1)</p> <p>Use growth and development to protect and enhance Auckland's environment (Direction 3)</p> <p>Focus on restoring environments as Auckland grows (Focus area 2)</p> <p>Account fully for the past and future impacts of growth (Focus area 3)</p> <p>Use green infrastructure to deliver greater resilience, longterm cost savings and quality environmental outcomes (Focus Area 6)</p>
Opportunity and Prosperity	<p>Create the conditions for a resilient economy through innovation, employment growth and raised productivity (Direction 1).</p> <p>Ensure regulatory planning and other mechanism support business, innovation and productivity growth (Focus area 2)</p>
Our Development Strategy	<p>In future urban areas the FULSS sequences when land will be live zoned, based on when necessary bulk infrastructure will be available. Development in Drury West is sequenced for from 2022 and anticipated to accommodate 4,200 dwellings in Stage 1 and 5,700 dwellings in Stage 2 (2028 onwards).</p> <p>Because of the scale of growth envisaged in Auckland's future urban areas, and the housing and employment choices they can provide, it is crucial that they are developed in an efficient, cost-effective and sustainable way.</p> <p>They also need to be vibrant places for the new communities who will live there. This requires a network of strong centres and neighbourhoods, integrated with good transport choices, and supported by a wide range of housing types and densities.</p>

Any relevant management plans and strategies prepared under any other Act

Other relevant plans and strategies to be considered under Section 74(2)(b)(i) and of relevance to PPC51 are summarised in Table 6 below.

Table 6 Other relevant plans and strategies

Relevant Act/ Policy/ Plan	Section	Matters
10 Year Budget 2018-2028 (Long Term Plan)	Volume 2: Our detailed budgets, strategies and policies	<p>Planned and funded infrastructure relevant to the plan change area includes:</p> <ul style="list-style-type: none"> - SH1 improvements Manukau to Bombay \$480m in decade 1 - Electrification of rail line to Pukekohe \$751m in decade 1

		<ul style="list-style-type: none"> - Provision for other transport infrastructure in Drury-Opāheke and other southern growth areas from 2029 onwards - Provision for stormwater infrastructure for Drury-Opāheke and several other future urban areas \$69m in decade 1 and more from 2029 onwards - Acquisition of open space for Drury-Opāheke and several other future urban areas \$696m in decade 1 and more from 2029 onwards
Auckland Council Draft 2021 Long Term Plan	Key issue 3: Responding to housing and growth	<p>Council's draft 2021 Long Term Plan identifies that the Council is investigating additional infrastructure requirements to support a large number of growth areas across Auckland. However, funding and financing new infrastructure in all of those areas is a major challenge. The LTP states that the focus of limited infrastructure investment capacity will be in a few key areas:</p> <ul style="list-style-type: none"> • areas agreed with the government as part of the Auckland Housing Programme, including Mt Roskill, Māngere, Tāmaki, Oranga and Northcote • where significant government investment has been made, such as Drury in Auckland's south, and areas in Auckland's north-west • where investment in significant projects, such as the City Rail Link, is being made. <p>The draft LTP states that the Council is not in a position to cover all the potential costs in the focused areas, and there will need to be prioritisation of projects within these areas. This focused approach will mean that they will not be heavily investing in infrastructure to support other growth areas in the short to medium term beyond that which is already committed. The plan notes that the council will continue to work with central government and private sector developers to explore alternative ways to progress development. This would include using the new Infrastructure Funding and Financing Act 2020.</p>
Future Land Supply Strategy 2017	The Programme – sequencing of the future urban areas	Timing of the plan change is consistent with the FULSS. See section 2.2 above.
Auckland Transport Alignment Project 2021	ATAP Package Detail	<p>Along with the NZUP projects, ATAP provides for the following:</p> <p><i>“Drury & Paerata Growth Area Funding for transport infrastructure in the Drury area to support the NZUP investment. \$243m”.</i></p> <p>However, actual funding commitments will need to be made in the next iteration of the Regional Land Transport Plan.</p>
Auckland Council draft 2021-2031 Regional Land Transport Plan (RLTP)	Section 5: Responding to Auckland's Transport Challenges, p58	The draft RLTP states that almost \$250 million is proposed to support the accelerated development of the Drury growth area through public transport links, including to the new Drury rail stations. This is in addition to the new stations themselves, the Mill Road Corridor, SH1 widening to Drury South, and new SH1 Drury South Interchange funded through NZUP.
Franklin Local Board Plan 2020	<p>Outcome 1: Our strengths generate local opportunity and prosperity</p> <p>Outcome 2: Improved transport</p>	Our distance from Auckland's economic city centre, poor transport options and unreliable internet connectivity are challenges in attracting and sustaining new business and remote workers. This makes our people vulnerable to fluctuations in the economy. Our goal is to support our people to create and access new job opportunities, advocate for regional, national and

	options and fit for purpose roads	third party investment in infrastructure, and invest in initiatives that develop, leverage from and promote our local strengths as we anticipate changes to our economy, environment and population. Opportunities include new train stations at Drury and new public transport services to connect people to services and facilities. Challenges include that transport options are not developing in parallel to urban development, which is sustaining car-dependency. Green-field development areas and rural communities are not serviced by public transport.
Papakura Local Board Plan 2020	Outcome 1: A vibrant and prosperous local economy Outcome 3: A well-connected area where it's easy to move around	Papakura intends to make the most of its zoning as a metropolitan centre. Objectives include thriving business in the local board area as local people buy from local businesses, maximising opportunities presented by the new development in Drury. Connectivity objectives include cycleways and walkways providing safe, connected, alternative routes including greenways to residential development in Drury.
Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan 2020	Core goals <ul style="list-style-type: none"> • To reduce greenhouse gas emissions by 50 per cent by 2030 and achieve net zero emissions by 2050 • To adapt to the impacts of climate change by ensuring we plan for the changes we face under our current emissions pathway 	Carbon Dioxide emitted by road transport modes is identified as the primary greenhouse gas (GHG) impacting the Auckland Region. Carbon dioxide is a long-lived GHG, meaning it accumulates and has long-lasting implications for climate. In terms of the built environment, the plan identifies that integrating land use and transport planning is vital to reduce the need for private vehicle travel and to ensure housing and employment growth areas are connected to efficient, low carbon transport systems. Our approach to planning and growth is identified as a priority action area, which aims to ensure our approach to planning and growth aligns with low carbon, resilient outcomes. Targets include: <ul style="list-style-type: none"> - 40% of new dwellings to be in transit-oriented developments by 2030 - a 12 per cent reduction in total private vehicle VKT (vehicle kilometres travelled) by 2030 against a 'business-as-usual' scenario through actions such as remote working and reduced trip lengths, with public transport mode share to increase from 7.8% to 24.5% by 2030, cycling mode share to increase from 0.9% to 7% and walking mode share to increase from 4.1% to 6%.

APPENDIX 7

SUBMISSIONS AND FURTHER SUBMISSIONS

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jennifer Catherine Joyce

Organisation name:

Agent's full name:

Email address: tjjoyce@xtra.co.nz

Contact phone number:

Postal address:
15 Burberry road
RD 2
Drury
Drury 2578

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:

Property address: 15 Burberry road, Drury

Map or maps:

Other provisions:
We generally support the provisions as notified

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

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

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

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

1.1

Details of amendments:

Submission date: 22 September 2020

Attend a hearing

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

Declaration

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

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

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

Yes

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

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Yu Wang

Organisation name:

Agent's full name:

Email address: ppbb6606@gmail.com

Contact phone number:

Postal address:
18 Brian Slater Way
stonefields
Auckland 1072

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:
Drury 2 precinct

Property address: 20 burberry road, Drury west

Map or maps: pc51-attachment 3 precinct plan

Other provisions:

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

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

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

The reason for my or our views are:

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

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

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

Submission date: 22 September 2020

Attend a hearing

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

Declaration

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

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

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

No

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

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

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

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

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

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

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

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



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

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) _____ Eloise Taylforth, Planner - Beca

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

_____ Fire and Emergency New Zealand

Address for service of Submitter

_____ PO Box 6345 Victoria Street West, Auckland 1142

Telephone: _____ 93009044 Fax/Email: _____ eloise.taylforth@beca.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number _____ PC 51 (Private)

Plan Change/Variation Name _____ Drury 2 Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)	<u>addition of policy to ensure all future development to be supported by water supply infrastructure</u>
Or	
Property Address	
Or	
Map	
Or	
Other (specify)	

Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

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

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

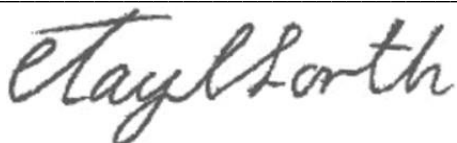
If the proposed plan change / variation is not declined, then amend it as outlined below.

Please refer to submission letter attached

I wish to be heard in support of my submission

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

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



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

12.10.2021

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Form 13

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

To: Auckland Council

Submission on: Private Plan Change 51

Name of submitter: Fire and Emergency New Zealand

Address for service: c/o Beca Ltd

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

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

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

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

Background:

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

The Fire and Emergency submission is:

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

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

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

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

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

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

3.1

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

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

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

Fire and Emergency is not a trade competitor.

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



Eloise Taylforth
Planner
Beca

Date: 12/10/2020

¹ As proposed by Private Plan Change 49.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Wendy Hannah

Organisation name: God Save The Flag Ltd

Agent's full name:

Email address: hannahshouse87@gmail.com

Contact phone number: 0273342444

Postal address:
PO Box 38513

Howick
Auckland
Auckland 2012

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:

Property address: 228 Flanagan Road Drury 2113

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

Other provisions:

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

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

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

The reason for my or our views are:

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

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

4.1

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

Submission date: 19 October 2020

Supporting documents
228 Flanagan Road Map_20201019182544.072.pdf

Attend a hearing

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

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

Declaration

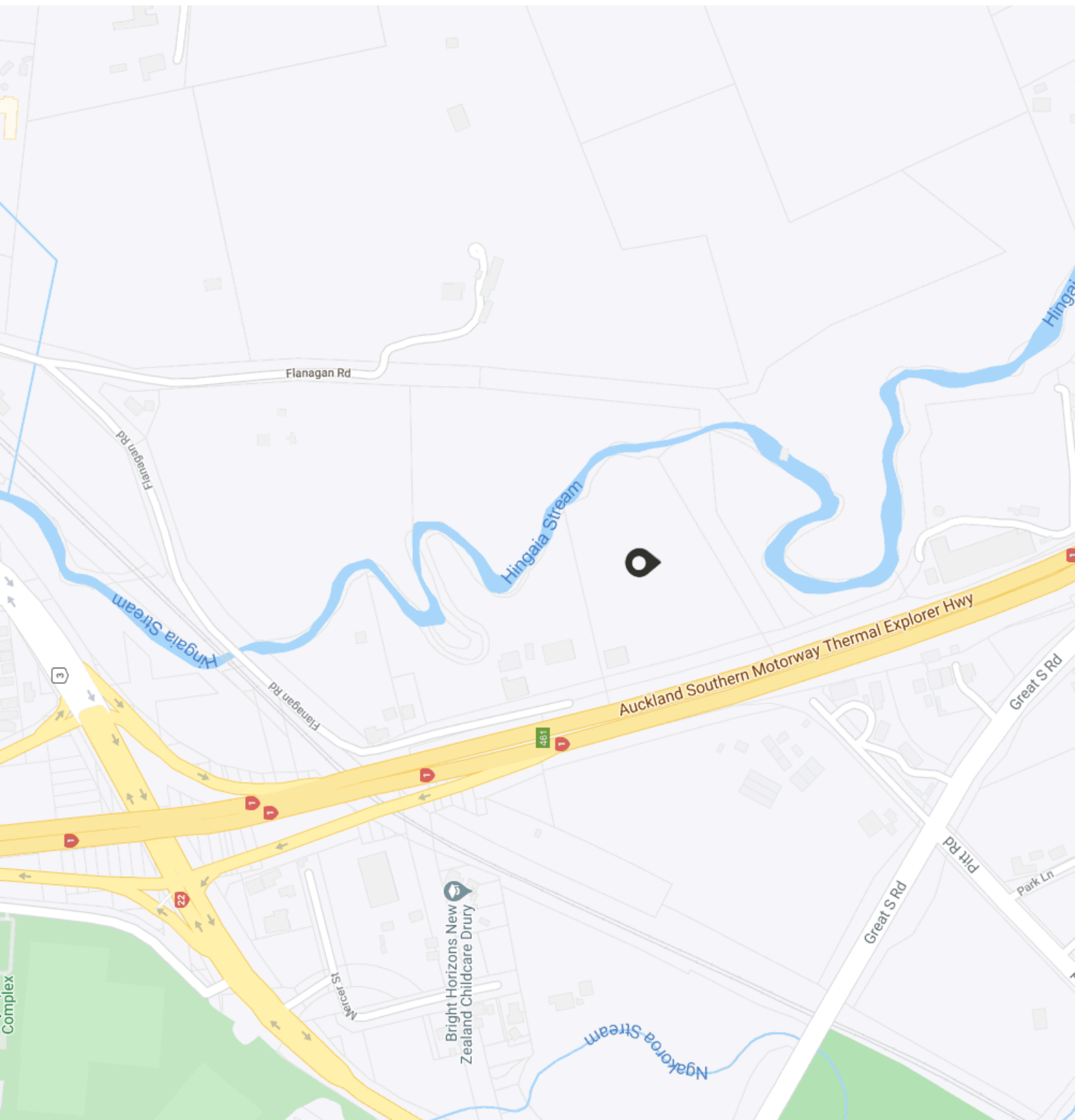
Could you gain an advantage in trade competition through this submission? No

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

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

Yes

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



The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rachel and Michael Gilmore

Organisation name:

Agent's full name:

Email address: mikejamesgilmore@gmail.com

Contact phone number:

Postal address:
20 Flanagan Rd
Drury
Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:

Property address:

Map or maps: Precinct plan

Other provisions:

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

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

The reason for my or our views are:

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

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

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

Details of amendments:

Submission date: 19 October 2020

Attend a hearing

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

Declaration

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

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

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

No

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

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Phil Hogan

Organisation name: Britmat Holdings Ltd

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

Email address: paulsousa@xtra.co.nz

Contact phone number: 0272595070

Postal address:
12A Mace Terrace
Oakura
New Plymouth 4314

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:

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

Property address: 1A East Street, Drury

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

Other provisions:

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

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

The reason for my or our views are:

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

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

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

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

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

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

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested | 6.1

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

Submission date: 20 October 2020

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

Attend a hearing

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

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

Declaration

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

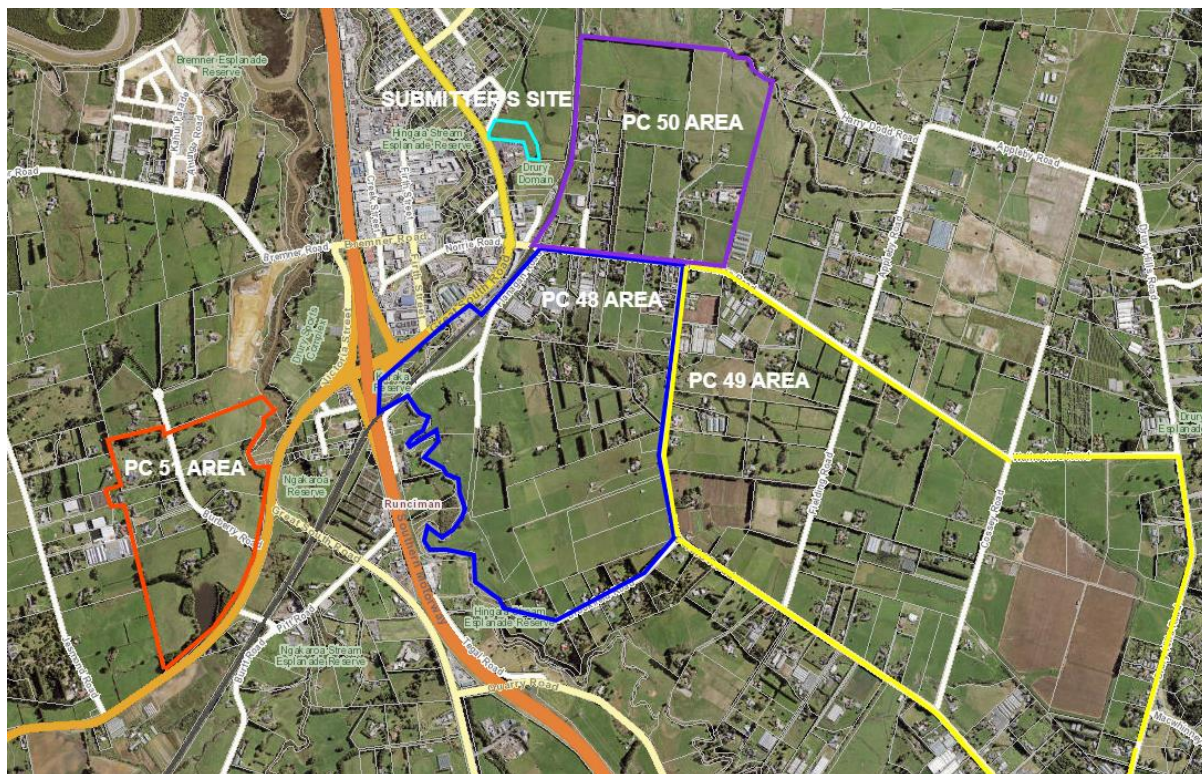
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

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



The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Zane Wood

Organisation name: First Gas Limited

Agent's full name: Zane Wood

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

Contact phone number: 027 287 7248

Postal address:
42 Connett Road
Merrilands
New Plymouth 4312

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:

Property address: Multiple addresses

Map or maps:

Other provisions:
As identified in the submission.

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

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

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

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

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

Submission date: 21 October 2020

Supporting documents
Plan Change 51.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

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

1. Introduction to Submitter:

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

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

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

2. Understanding the Plan Change:

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

3. Firstgas assets within the Plan Change area:

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

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

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

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

B3.2.1 Objectives

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

B3.2.2 Policies

Provision of infrastructure

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

Reverse sensitivity

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

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

E26.2.1. Objectives

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

E26.2.2 Policies

Adverse effects on infrastructure

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

5. Firstgas operating standards and codes:

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

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

6. Submission Statement:

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

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

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

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

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

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

Proposed Objectives IX.2

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

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

Proposed Policies IX.3

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

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

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

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

| 7.8

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

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

8. Conclusion

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



CATHOLIC DIOCESE OF AUCKLAND

19 October 2020

Auckland Council

Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attention: Planning Technician

By email: unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Private Plan Change 51

FROM: The Catholic Diocese of Auckland

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

DATE: 19 October 2020

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

NOTE:

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

INTRODUCTION

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

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

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



CATHOLIC DIOCESE OF AUCKLAND

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

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

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

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

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

SUBMISSION

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

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

The basis for the submission is as follows:

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



CATHOLIC DIOCESE OF AUCKLAND

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

DECISION SOUGHT

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

HEARING

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

Michael Butler
Portfolio and Development Manager
Catholic Diocese of Auckland

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

To: The Chief Executive

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

Introduction:

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

Reasons for submission:

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

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

Relief sought:

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

Hearing:

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

Signature



Name

Adam Yates.

Title

CEO

Date

22/10/20

Address

151 Pillans Road, Otumotai, Tauranga 3110.

Phone number

0275 349913.

e-mail

adam@yates.co.nz.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Fiona Matthews

Organisation name: Spark New Zealand Trading Limited

Agent's full name:

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

Contact phone number: 021772005

Postal address:
Private Bag 92028

Auckland 1010

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:
Refer to the attached submission

Property address:

Map or maps:

Other provisions:
Refer to the attached submission

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

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

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

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

Details of amendments: Refer to the attached submission

Submission date: 22 October 2020

Supporting documents
Spark submission PPC51.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Form 5
Submission on publicly notified Plan Change (Private) 51.
Clause 6 of Schedule 1, Resource Management Act 1991

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

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

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

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

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

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



Signed:

On behalf of Spark New Zealand Trading Limited

Dated at Auckland this 22 day of October 2020.

Address for Service:

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

Contact Details:

Attention: Fiona Matthews
Telephone: 021772005
E-mail: fiona.matthews@spark.co.nz

Alternate contact details

Graeme McCarrison
027 4811 816
graeme.mccarrison@spark.co.nz



Introduction

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

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

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

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

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

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

¹ Commerce Commission Annual Telecommunications Monitoring Report 2019

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

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

Development Planning

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

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

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

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

Plan Change 51.

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

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

The plan change incorporates the following objective:

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

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

Funding

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

Planning

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

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

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

NPSUD Objective 1 seeks to ensure:

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

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

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

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

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

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

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

10.5

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

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

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

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

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

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

Current Spark Assets

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

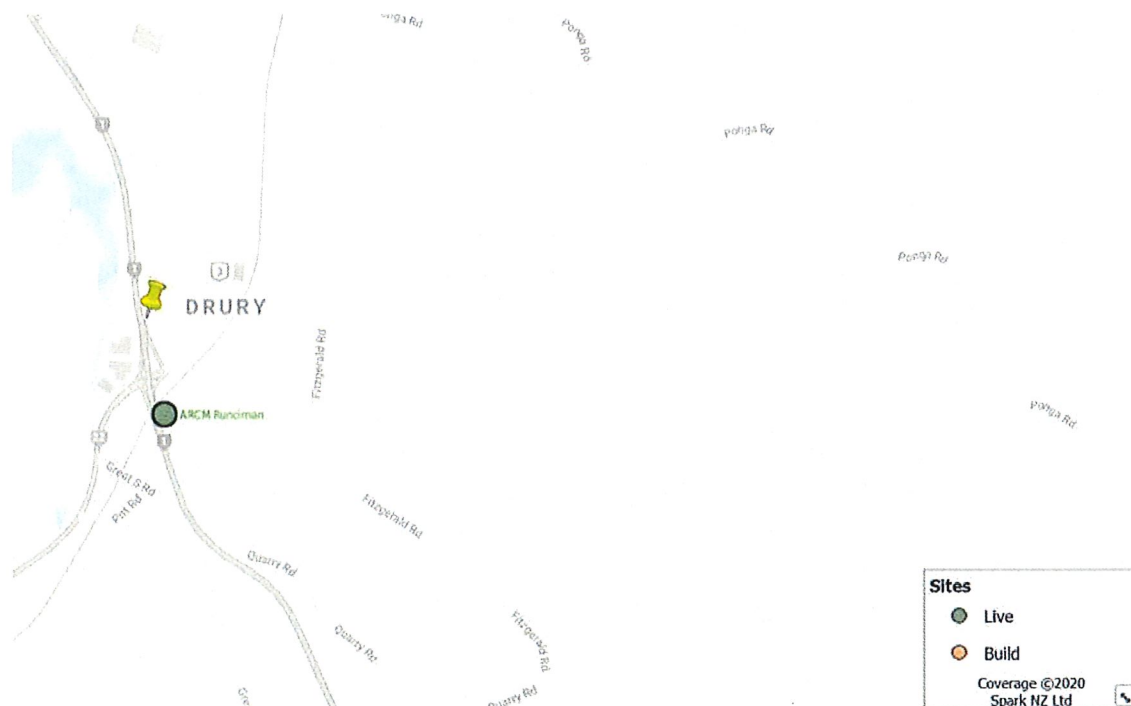


Figure 1. Drury Mobile site (Spark) (Source: Ventura GIS Mapping)

Future Development Strategy

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

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

Submission

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

Conclusion

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

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

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fiona Matthews', written in a cursive style.

Fiona Matthews
Senior Environmental Planner

The address for service and contact details are:

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

Fiona.matthews@spark.co.nz
021772005

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

To: Auckland Council

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

INTRODUCTION

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

BACKGROUND

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

Proposed Plan Change 51 (Auranga B2)

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

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

REASONS FOR SUBMISSION

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

DECISION SOUGHT

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

11.1

22 October 2020



Bill Loutit / Rachel Abraham
On behalf of Lomai Properties Limited

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

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

To: The Chief Executive

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

Introduction:

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

Reasons for submission:

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

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


Relief sought:

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

Hearing:

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

Signature


_____ WENDY JAO

Name KARAKA & DRURY CONSULTANT LTD

Title DIRECTOR

Date 21 / 10 / 2020

Address

121 BREMNER RD, DRURY

Phone number 021-402-988

e-mail jaowendy01@GMAIL.COM

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To: The Chief Executive

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 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

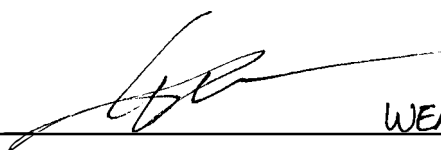
Relief sought:

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

Hearing:

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

Signature


_____ WENDY JAO

Name BARFILON INVESTMENT LTD

Title DIRECTOR

Date 21/10/2020

Address
132 BREMNER RD, DRURY

Phone number 021-402-988

e-mail JADWENDY01@GMAIL.COM

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To: The Chief Executive

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Level 24, 135 Albert Street
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3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
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 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

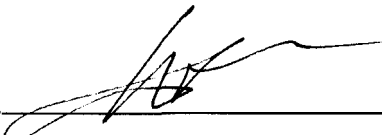
Relief sought:

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

Hearing:

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

Signature


_____ WENDY JAO

Name DL & WJ LTD

Title DIRECTOR

Date 21/10/2020

Address

160 BREMNER RD, DRURY

Phone number 021-402-988

e-mail JAOWENDY01@GMAIL.COM

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

Reasons for submission:

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 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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


Relief sought:

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

Hearing:

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

Signature

 WENDY JAO

Name NOAH EASTERN LTD

Title DIRECTOR

Date 21/10/2020

Address

322 BREMNER RD, DRURY

Phone number 021-402-988

e-mail jaowendy01@GMAIL.COM

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

Relief sought:

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

Hearing:

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

Signature

 _____ WENDY JAO

Name NOAH EASTERN LIMITED

Title DIRECTOR

Date 21/10/2020

Address

25 KAHUI PARADE, DRURY

Phone number 021-402-988

e-mail JAOWENDY01@GMAIL.COM

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

Reasons for submission:

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 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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

Relief sought:

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

Hearing:

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

Signature

 _____ WENDY JAO

Name NOAH EASTERN LIMITED

Title DIRECTOR

Date 21/10/2020

Address

27 KAHUI PARADE, DRURY

Phone number 021-402-988

e-mail JAOWENDY01@GMAIL.COM

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
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Reasons for submission:

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 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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

Relief sought:

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

Hearing:

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

Signature

 _____ WENDY JAO

Name _____ NOAH EASTERN LIMITED

Title _____ DIRECTOR

Date _____ 21/10/2020

Address

_____ 29 KAHUI PARADE, DRURY

Phone number _____ 021-402-988

e-mail _____ JAOWENDY01@GMAIL.COM

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

Reasons for submission:

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- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

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

Hearing:

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

Signature

 _____ WENDY JAO

Name NOAH EASTERN LIMITED

Title DIRECTOR

Date 21/10/2020

Address

35 KAHUI PARADE, DRURY

Phone number 021-402-988

e-mail JAOWENDY01@GMAIL.COM

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Auckland Unitary Plan**

To: The Chief Executive

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

Introduction:

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

Reasons for submission:

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

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

Relief sought:

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

Hearing:

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

Signature

 _____ WENDY JAO

Name _____ NOAH EASTERN LIMITED

Title _____ DIRECTOR

Date _____ 21/10/2020

Address

_____ 34 KAHUI PARADE, DRURY

Phone number _____ 021-402-988

e-mail _____ JAOWENDY01@GMAIL.COM

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
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Relief sought:

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

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Relief sought:

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Hearing:

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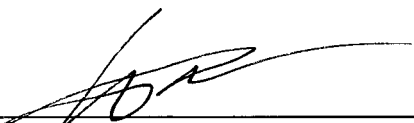
Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 16.1

Hearing:

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

Signature



Name WENDY JAO

Title _____

Date 21 / 10 / 2020

Address

269 BREMNER RD, DRURY

Phone number 021-402-988

e-mail jao.wendy.01@GMAIL.COM

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Relief sought:

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

Hearing:

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

Signature



Name L & W Rising Ltd

Title _____

Date 21/10/2020

Address
138 Bremner Rd , Drury

Phone number 0221033774

e-mail yinsangsu@gmail.com

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Relief sought:

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

Hearing:

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

Signature



Name Jing Chen

Title Director of New Elite Investment Ltd

Date 21/10/2020

Address 169 Bremner Road, Karaka

Phone number 027-6633-688

e-mail neliteinv@gmail.com

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Relief sought:

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Hearing:

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

Signature



Name Wang wensheng

Title Architect

Date 2020-10-21

Address No.245&No.253 .Bremner Roac

Phone number 0086-13801601535

e-mail 13801601535@163.com

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Signature

Wei Pan 

Name HUAWEI DEVELOPMENT LTD

Title Director

Date 21/10/2020

Address 3 Andy Crescent, Flat Bush, Auckland

Phone number 021731858

e-mail wpan008@gmail.com

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Hearing:

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Signature



Name Edison Yi

Title Director

Date 20/10/2020

Address
251 Bremner Road

Phone number 021360998

e-mail Logicicg@gmail.com

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Signature

Cxb

Name xibing chen

Title Director.

Date 21/10/2020

Address

259 Bremner Rd, Drury

Phone number 021-0226-0889

e-mail gds2cxb@gmail.com

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

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

Relief sought:

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

Hearing:

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

Signature



Name Hongyan zhao

Title Jal Glory investment ltd

Date 21/10/2020

Address 263 bremner rd drury

Phone number 021858626

e-mail hongyan-zhao@hotmail.com

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

To: The Chief Executive

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

Introduction:

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

Reasons for submission:

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

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- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

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

Hearing:

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

Signature



Name Jia Liu

Title _____

Date 21/10/2020

Address

312 Bremner Rd, Drury

Phone number 021816588

e-mail frankyliujia@hotmail.com

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

To: The Chief Executive

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

Introduction:

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Reasons for submission:

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 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

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

Hearing:

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

Signature



Name William Zhang Bremner Estates Development Limited

Title Director

Date 21/10/2020

Address 330 Bremner Road

Phone number 0274335938

e-mail wenyuhliou@msn.com

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

To: The Chief Executive

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

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

Reasons for submission:

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 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

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

Relief sought:

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

Hearing:

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

Signature



Name Auranga Resident's Association

Title Committee Members

Date 22/10/2020

Address

Lot 116, 259 Bremner Road

Phone number 0211597165

e-mail ara@auranga.co.nz

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

To: The Chief Executive

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

Introduction:

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

Reasons for submission:

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

J. Xun

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

Relief sought:

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

Hearing:

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

Signature



Name

JUNXIANG CHEN

Title

Director

Date

21/10/2020

Address

31 Burberry Road, Drury

Phone number

022-6666 383

e-mail

Brucechen.stc@gmail.com

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

To: The Chief Executive

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

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

Introduction

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

Reasons for submission:

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

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

Relief sought:

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

28.1

(b) In the alternative, if the Drury West train station is to be located west of the location shown in the DOSP (particularly west of Oira Road), the submitter supports any amendments to PPC 51 that may be sought by the PPC applicant, Karaka and Drury Limited (“KDL”), to address that change. This would include (but is not limited to) rezoning all of the PPC 51 land for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones. | 28.2

10. For the avoidance of doubt, the submitter does not support any changes being made to PPC 51 as notified, except where those changes are agreed to and supported by KDL. | 28.3

Hearing:

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

Signature



Name Charles Ma

Title Director

Date 22/10/20

Address

415 Bremner Road, Karaka

Phone number 0211597165

e-mail charles@made.co.nz

Hi there,

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

Key points being:

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

29.1

Thanks
Andrew

andrew.daken243@gmail.com

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: John Duan

Organisation name: Soco Homes Limited.

Agent's full name: Isobel Lee

Email address: isobel@topland.co.nz

Contact phone number: 092651356

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

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

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

Property address:

Map or maps:

Other provisions:

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

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

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

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

Details of amendments: Please see the attached submission.

Submission date: 22 October 2020

Supporting documents
Soco Homes Submission _20201022130222.886.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

22 Oct 2020

Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Via email: unitaryplan@aucklandcouncil.govt.nz

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

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

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

Kind regards,



John Duan

Director

Soco Homes Limited

Form 5**Submission on publicly notified Plan Change**
Clause 6 First Schedule, Resource Management Act 1991 (RMA)

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

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

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

Introduction

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

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

Scope of submission

9. This submission relates to the whole of PC51.

Reasons for submission

10. It is unsure whether PC51 will or will not:

- Enable the efficient use and development of resources in the area.
- Achieve integrated management of the effects of the use, development or protection of land and associated resources of the region.
- Meet the reasonably foreseeable needs of future generations.
- Enable social, economic and cultural wellbeing.

11. More information required on the road layout and infrastructure connections impact on the surrounding area.

12. Sufficient information has not been provided on how the proposed road layout and infrastructure connections will impact the wider area. It has also been noted that as part of the PC51 application, an urban design document was provided that shows the master planning for the greater Drury area commissioned by KDL. However, the future impact of the proposed road layout and infrastructure connections on the surrounding area remains unclear.

13. The impact of the road layout and infrastructure connections for PC51 is not limited purely to the PC51 land area and will form and contribute to the surrounding road and infrastructure networks in order to provide a sufficiently connected area. Therefore, any new roads and infrastructure connections are considered to impact the greater area and will impact the potential development options for the surrounding area.

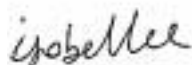
14. In order to enable the development of 54 Jesmond Road, to meet the Drury Structure Plan outcome, and to understand how the sites connectivity may be affected, additional information is sought on how the future road layout and infrastructure connections will impact the site. This will create development consequence of all the site along both sides of Jesmond Road (Future Urban zone).

Relief Sought

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

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

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



Isobel Lee

Date: 21 October 2020

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

Phone: 09 265 1356

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

To: The Chief Executive

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

Introduction:

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3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
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 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.



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

Relief sought:

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

Hearing:

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

Signature



Name Marmitmor Limited

Title Director

Date 22 October 2020

Address

37 Elliott Street

Phone number 021635583

e-mail darren@myharveys.co.nz



Watercare Services Limited

73 Remuera Road, Newmarket
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Auckland Council

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Attn.: Planning Technician

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TO: Auckland Council
SUBMISSION ON: Plan Change 51 (Private): Drury 2 Precinct
FROM: Watercare Services Limited
ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz
DATE: 22 October 2020

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

1. INTRODUCTION

1.1. Watercare's purpose and mission

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

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

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

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

2. SUBMISSION

2.1. General

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

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

Watercare neither supports nor opposes the Plan Change.

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

2.2. Specific parts of the Plan Change

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

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

Watercare has reviewed the Plan Change and considers that:

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

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

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

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

2.2.1. Water supply servicing for the Plan Change Area

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

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

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

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

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

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

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

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

2.2.2. Wastewater servicing for the Plan Change Area

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

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

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

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

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

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

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

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

3. DECISION SOUGHT

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

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

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

32.1

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

32.1

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

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

4. HEARING

Watercare wishes to be heard in support of its submission.

22 October 2020

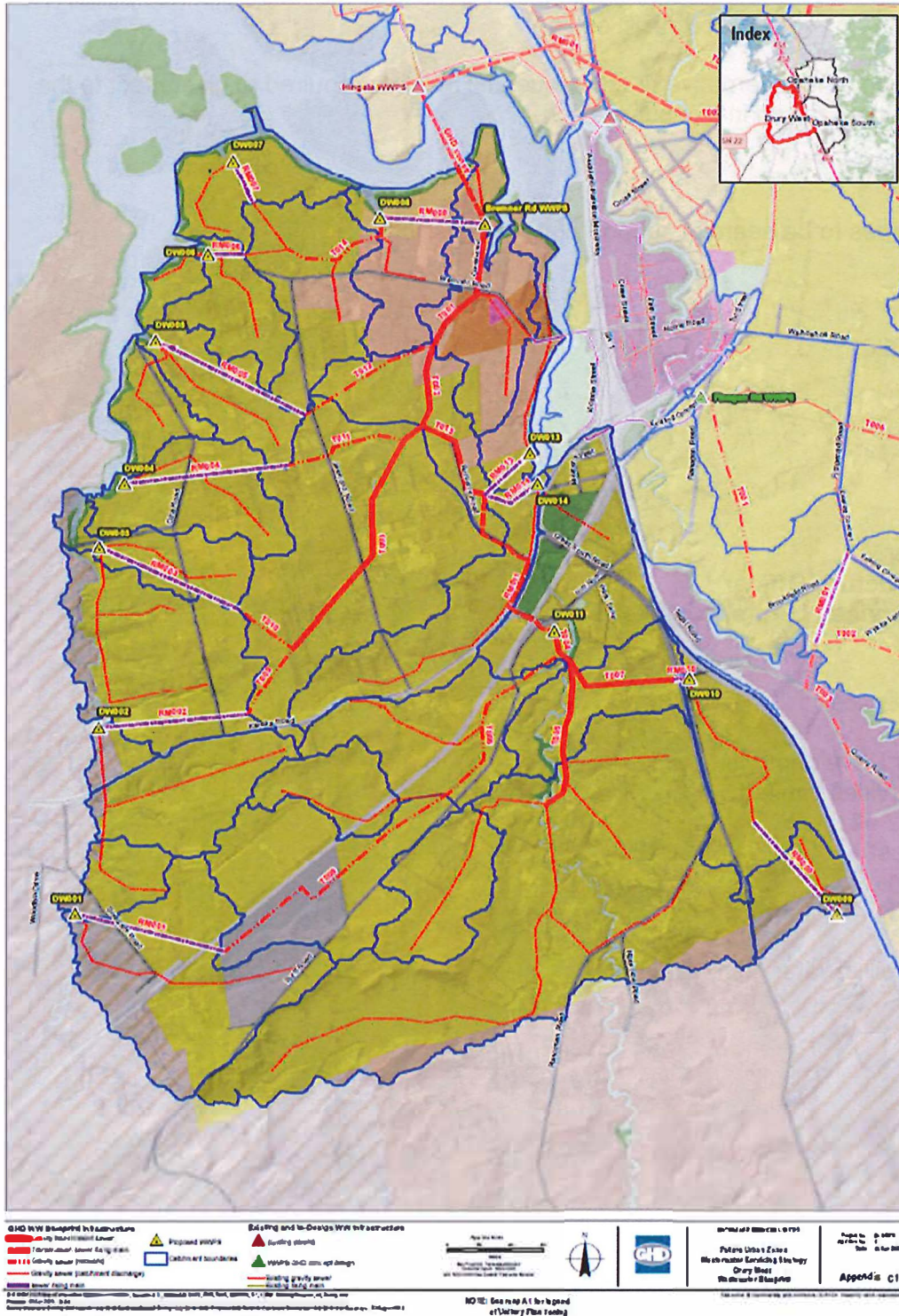


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Appendix A: Drury West Wastewater Servicing Plan





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

To: Auckland Council

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

INTRODUCTION

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

SUBMISSION

General

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

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

Consultation

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

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

Adverse Cultural, Social and Environmental Effects

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

RELIEF

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

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

22 October 2020



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

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Contact person: Bill Loutit, Simpson Grierson

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

Resource Management Act 1991

22 October 2020

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

mail: unitaryplan@aucklandcouncil.govt.nz

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

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

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

HUD's role and responsibilities

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

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

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

Wider Context

Auckland Housing and Urban Growth Programme

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

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

The National Policy Statement on Urban Development

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

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

Transit-orientated development

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

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

Drury-Opāheke Structure Plan

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

NZ Upgrade Programme

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

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

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

Auckland Future Urban Land Supply Strategy

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

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

Scope of Submission

The submission relates to the Plan Change in its entirety.

The Submission is:

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

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

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

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

Relief Sought

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

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

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

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

Hearings

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

Signature of person authorized to sign on behalf of Submitter:



Brad Ward

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

Address for Service of person making submission:

Ministry of Housing and Urban Development

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Table 1: Requested Plan Change amendments

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

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

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

A N D

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

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

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Name of Submitter: Auckland Council
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Introduction

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

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

GENERAL REASONS FOR THE SUBMISSION

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

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

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

SPECIFIC REASONS FOR THE SUBMISSION

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

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

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

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

PC 51 is inconsistent with relevant planning instruments

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

NPS-UD

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

AUP RPS

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

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

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

[Emphasis added]

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

Auckland Plan

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

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

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

LTP

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

RLTP

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

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

Effects of failure to integrate infrastructure and land use

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

Further specific reasons

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

RELIEF SOUGHT

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

35.1

Conclusion

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

DATED 22nd October 2020

On behalf of Auckland Council:

Councillor Chris Darby, Chairperson of the Planning Committee



Councillor Josephine Bartley, Deputy Chairperson of the Planning Committee



Councillor Desley Simpson, Chairperson of the Finance and Performance Committee



Tau Henare, Independent Māori Statutory Board member



Signatures of persons authorised to sign on behalf of submitter

SCHEDULE – FURTHER SPECIFIC REASONS FOR THE SUBMISSION AND ALTERNATIVE RELIEF

Infrastructure funding and timing

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

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

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

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

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

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

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

Open Space

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

Rules_general

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

35.17

Land use

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

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	<p>within walkable catchments of rapid transit network (RTN) stations.</p> <p>Walkable distances are not defined in the RMA or RMA documents. However, this matter was investigated in preparation of Drury – Opāheke Structure Plan August 2019 in relation to RTN train stations.</p> <p>The local road network does not fully exist yet in these greenfield locations so actual walking distances along road footpaths cannot be measured yet. Instead it is appropriate to use a walkable radius from the proposed train station as a proxy for median actual walkable distances. This is expressed as an 'extended walkable' distance in the requested provisions to enable further discussion of an appropriate distance as this is not an exact science.</p> <p>It is also appropriate to consider an additional shorter walkable radius as being an area where a much higher (above median) level of walkability can potentially be achieved. This is expressed as a 'short walkable' radius in the requested provisions to enable further discussion of the appropriate distance.</p> <p>The actual position of the Drury West station has not been confirmed at the time of writing. But it is likely that some of the PC 51 area will be within the station walkable catchment. Therefore, increased density should be enabled in this area.</p> <p>The NPS-UD prioritises increased densities within a walkable distance of RTN stations with a focus on use of tall buildings to achieve this. At least six storeys is to be enabled but more is preferred by the NPS-UD Policy 3.</p>	<p>a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u></p> <p>b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station.</p> <p>c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height.</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.</p>
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	<p>It is considered that there is not a large difference in potential adverse effects of height between 6, 7, or 8 storeys. Therefore, it is recommended that a building height control that provides for 7 to 8 storeys be applied within an extended walkable distance of the RTN station to enable greater density. This can be given effect to by applying the AUP 27m height variation control within an extended walkable radius of the station. Some adjustment beyond this distance may be appropriate to better align with property boundaries.</p> <p>At still higher building heights, adverse effects can become more significant and a different range of standards are appropriate to address that. Overall, it is considered that with a short walkable radius of an RTN station, where high walkability is possible, taller buildings should be provided to enable higher density. This is subject to additional or amended standards that address the effects of towers. The building height standard of 72.5m (about 23 storeys) as used in the Metropolitan Centre Zone is considered an appropriate standard for land within a short walkable radius of an RTN Station to give effect to the NPS-UD.</p> <p>The requested information standard would ensure that resource consent applications provide sufficient information to assess whether the development is consistent with the policy.</p> <p>The requested amendments collectively provide for policy and standards to enable increased density and walkability near the RTN station.</p>	
19.	<p>The use of the retail frontage and commercial frontage controls is supported in principle. However, this control is usually mapped to an existing road. In this case if the</p>	<p>Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.</p>

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

35.21

Mana whenua

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

35.22

Natural heritage

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

35.23

35.24

Attachment 1

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



FORM 5

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

22 October 2020

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

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

Name of submitter: The New Zealand Transport Agency

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

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

Waka Kotahi role and responsibilities

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

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

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

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

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

Government Policy Statement on Land Transport.

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

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

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

Transport Sector Outcomes Framework

Wider Context

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

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

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

Decision sought

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

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

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

Hearings

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

Signature of person authorised to sign on behalf of Submitter:



Kim Harris Cottle

Team Lead – Transport Services

Waka Kotahi

Address for Service of person making submission:

NZ Transport Agency

Contact Person: Brendan Clarke

Email: Brendan.clarke@nzta.govt.nz

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

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

36.1

36.2

36.3

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

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

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

Attachment 1:

Permitted Activity Rule IX.6

36.16

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

Outdoor road noise

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

Indoor road noise

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

36.16

Table 1

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

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

36.16

Mechanical ventilation

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

Indoor road vibration

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

Design report

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

Restricted Discretionary Activity – Matters of Discretion IX.8.2

Discretion is restricted to:

36.17

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

Restricted Discretionary Activity – Assessment Criteria IX.8.2

Discretion is restricted to:

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

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

Clause 6. Schedule 1 to the Resource Management Act 1991

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

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

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

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

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

7. PAN seeks the following relief from Auckland Council:

(a) That the Plan be amended by:

(i) A provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, water, wastewater, stormwater and other methods of transport.

37.1

(ii) That Burberry Road not be stopped until an alternative route is in place.

(iii) That the alternative access to Burberry Road be of a standard not less than that currently exists

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

37.2

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

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

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

Dated this 22nd day of October 2020

Elly S Pan



By Nigel Hosken on behalf of Elly S Pan

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

E-mail nigel@hosken.co.nz

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Counties Power Limited

Organisation name:

Agent's full name: Jeremy Brydon

Email address: jbrydon@align.net.nz

Contact phone number: 092824768

Postal address:
PO Box 147105
Ponsonby
Auckland 1144

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:
See attached submission

Property address:

Map or maps:

Other provisions:

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

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

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

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

Details of amendments: See attached submission

Submission date: 22 October 2020

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

Attend a hearing

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

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

Declaration

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

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

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

No

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

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



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

Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

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

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited

File Reference: COUNT038

Version:

Issue 1.0	22 October 2020	For submission
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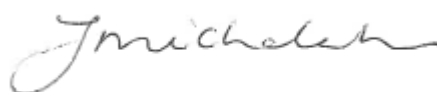
Distribution:

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



Produced by:

Jeremy Brydon



Review by:

Jo Michalakis

Align Limited

Date: 22 October 2020

Limitations:

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

1. Introduction

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

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

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

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

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

2. About Counties Power

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

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

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

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

3. The Counties Electricity Network

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

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

HV network comprises:

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

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

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

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

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

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

4. Low carbon development

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

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

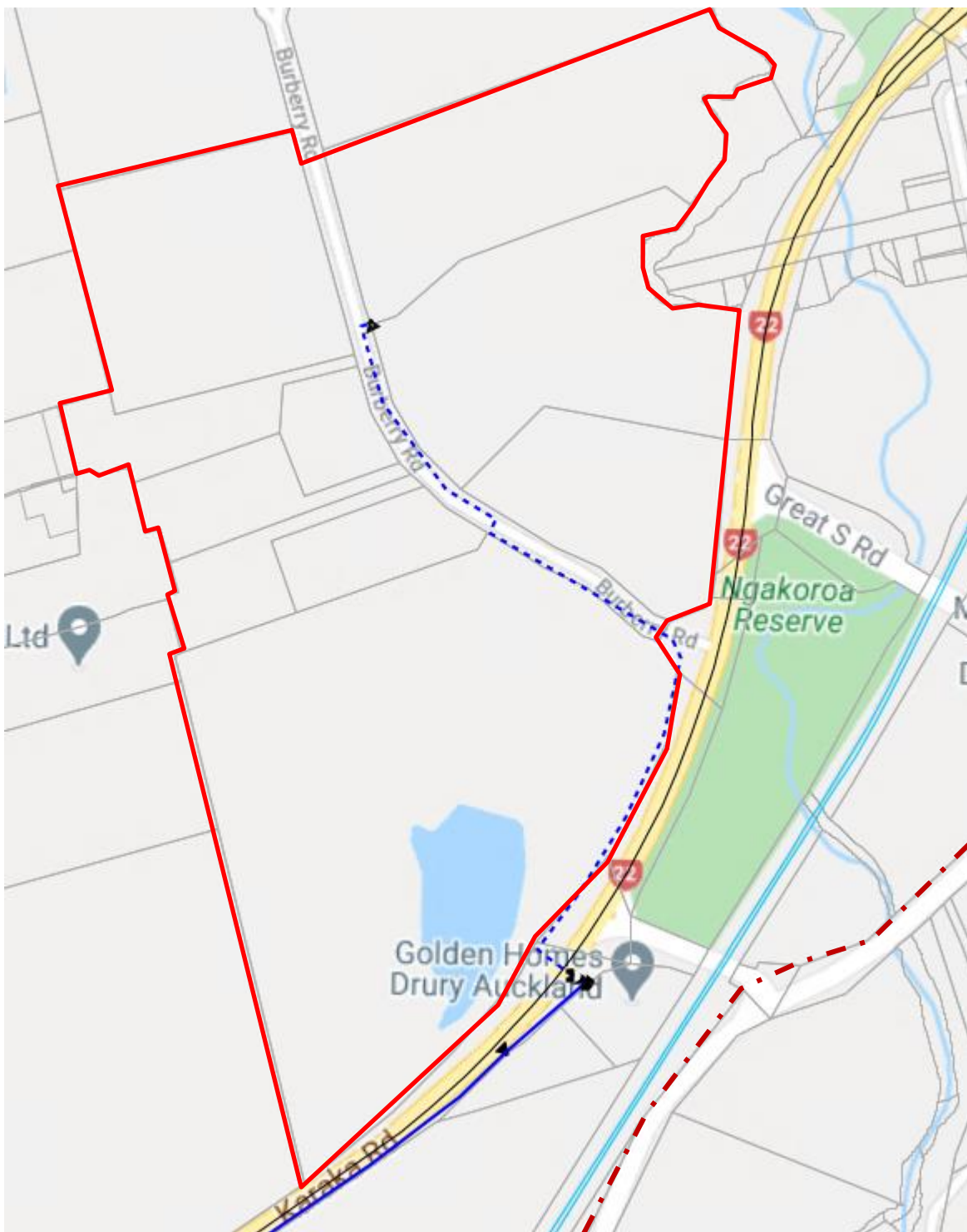
IX Drury 2 Precinct				
Objective/Policy	Provision	Position	Reason for position	Relief Sought
IX Drury 2 Precinct				
Objective IX.2 (4)	Establish the infrastructure necessary to service development within the Precinct in a coordinated and timely way.	Support	<p>There is sufficient capacity projected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

38.1





38.2

38.3

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



Existing Counties Power Infrastructure

	22kV distribution (overhead)		Plan area
	22kV distribution (underground)		
	Fibre – high criticality (overhead/underground)		

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Counties Power Limited

Organisation name:

Agent's full name: Jeremy Brydon

Email address: jbrydon@align.net.nz

Contact phone number: 092824768

Postal address:
PO Box 147 105
Ponsonby
Auckland 1144

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:
See attached submission

Property address:

Map or maps:

Other provisions:

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

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

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

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

Details of amendments: See attached submission

Submission date: 22 October 2020

Supporting documents

Appendix 1 - CP line assets_20201022165006.474.pdf

201022_10_PPC51_Counties-Power-submisison_20201022165718.485.pdf

Attend a hearing

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

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

Yes

Declaration

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

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

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

No

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

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



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

Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

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

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited

File Reference: COUNT038

Version:

Issue 1.0	22 October 2020	For submission
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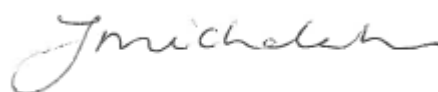
Distribution:

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



Produced by:

Jeremy Brydon



Review by:

Jo Michalakis

Align Limited

Date: 22 October 2020

Limitations:

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

1. Introduction

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

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

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

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

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

2. About Counties Power

Counties Power is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act (RMA). Counties Power is a requiring authority in respect of its electricity network (NZ Gazette 13 January 1994, p55).

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

Counties Power is 100% consumer owned. All shares are held by the Trustees of the Counties Power Consumer Trust (Trust) on behalf of all local power consumers. The Trust has a total of five Trustees, of which two are required to be elected every two years. Counties Power is managed for the benefit of its consumers and their communities. The Trust oversees the performance of Counties Power through the appointment of a Board of Directors (Board). The Board and Management of Counties Power consult the Trust on the strategic direction, business plans, and asset management measures and targets. Information about the Trust can be obtained from www.countiespowertrust.co.nz.

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

3. The Counties Electricity Network

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

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

HV network comprises:

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

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

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

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

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

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

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

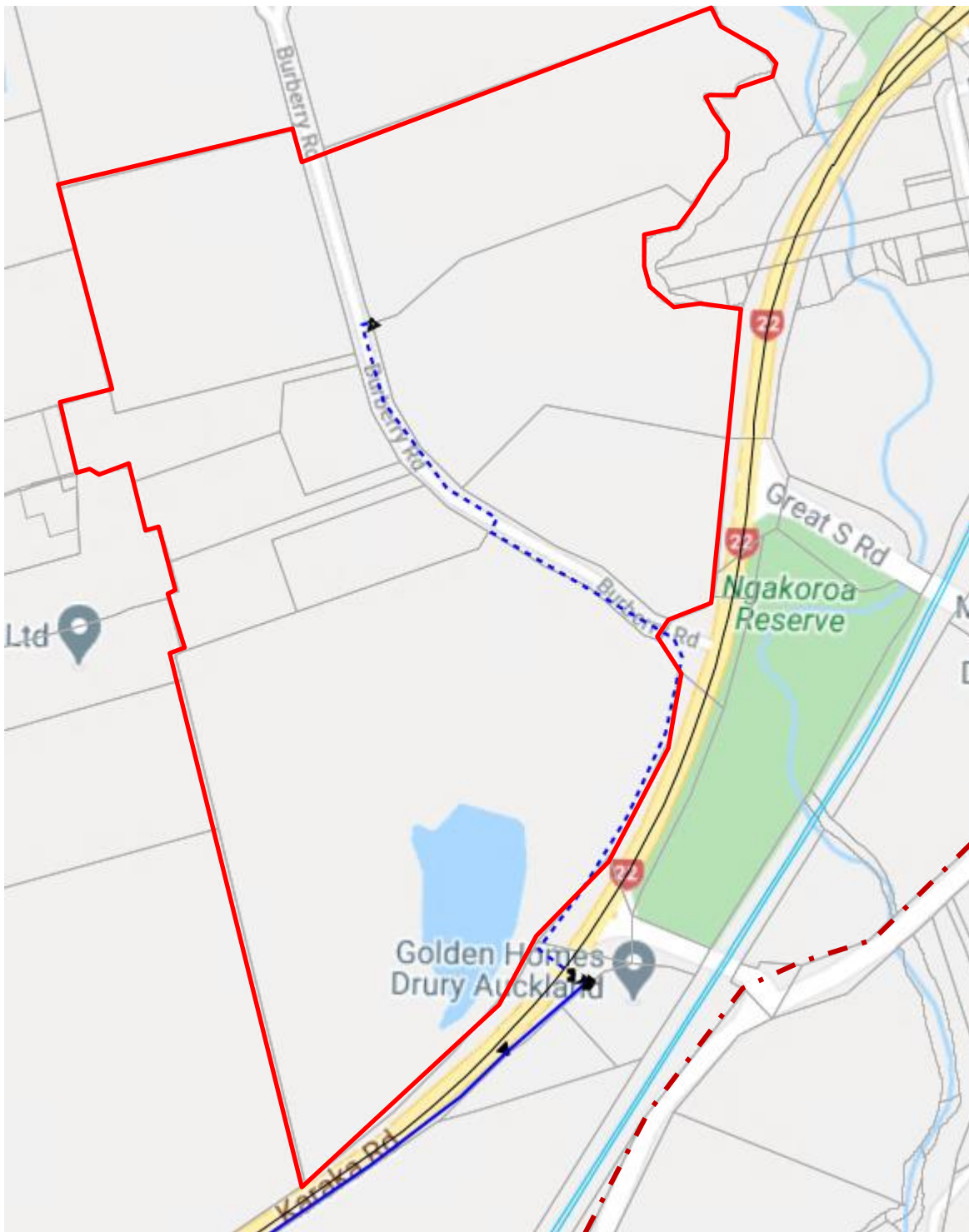
4. Low carbon development

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





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

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

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



Existing Counties Power Infrastructure

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

22 October 2020

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

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Proposed Private Plan Change 51 – Drury 2 Precinct

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

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

Yours sincerely



Chris Freke
Principal Planner, Urban Development Programmes

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

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

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



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

To Auckland Council
Private Bag 92300
Auckland 1142

From Auckland Transport
Private Bag 92250
Auckland 1142

1.0 Introduction

1.1 Karaka and Drury Limited (**the applicant**) has lodged a proposed private plan change (**PPC51** or **the plan change**) to the Auckland Unitary Plan: Operative in Part (**AUPOP**) to rezone 33.65 hectares of land in Drury West from Future Urban zone to 15.29 hectares of Business: Town Centre zone, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings zone and 4.61 hectares of Residential: Residential: Mixed Housing Urban zone. PPC 51 also seeks to introduce a new Drury 2 Precinct across the extent of the plan change area.

1.2 Auckland Transport is a Council Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'¹. In fulfilling this role, Auckland Transport is responsible for:

- a. The planning and funding of most public transport;
- b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
- c. Operating the roading network; and
- d. Developing and enhancing the local road, public transport, walking and cycling networks.

1.3 Auckland Transport is part of Te Tupu Ngātahi Supporting Growth (**SG**) which is a collaboration between Auckland Transport and Waka Kotahi NZ Transport Agency (**Waka Kotahi**) to plan and route protect the preferred transport network in future growth areas such as Drury. In reviewing this plan change, Auckland Transport has had regard to the draft Integrated Transport Assessment dated April 2019, which complemented the Drury – Opāheke Structure Plan. The Drury – Opāheke Structure Plan was prepared by Council and went through a robust

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



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

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

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

2.0 **Auckland Transport's submission is:**

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

Auckland Plan 2050

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

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

Managing Auckland-wide growth and rezoning

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



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

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

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

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



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

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

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

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

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

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

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



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

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

Supporting transport and land use integration opportunities

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

Cumulative effects

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

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



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

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

Assessment and identification of effects and mitigation

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

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



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

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

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

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

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

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

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

4.0 Decisions sought from the Council



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



Name: Auckland Transport

Signature:

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

Christina Robertson
Group Manager, Strategic Land Use and Spatial
Management

Date: 22 October 2020

Contact person: Chris Freke
Principal Planner, Urban Development Programmes

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Attachment 1

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

Italics = *PPC 51 notified text*

Strikethrough = ~~proposed deletions~~

Bold and underline = **proposed additions**

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



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



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



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



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



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

39.6

39.7



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



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



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



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Auckland Transport also considers that there should be a direct east west link from Jesmond Road to the town centre and north south collector network which is capable of accommodating buses.</p> <p>There is a need to provide some certainty and definition of the proposed network which needs to be integrated with that to be applied beyond the precinct.</p>	<p>capable of accommodating buses.</p>
<p>Town centre and proposed north south Collector road intersecting opposite McPherson Road</p>	<p>IX.10. Precinct Plan</p>	<p>Oppose in part</p>	<p>Auckland Transport supports in general the provision of a North South Collector Road intersecting with Karaka Road somewhere between Great South Road and Jesmond Road.</p> <p>However, there are some concerns over the feasibility of the location proposed given the presence of the lake and non-optimal angle of entry. McPherson Road also has a standard clearance under the North Island Main Trunk railway line and upgrading it to a major intersection may increase the risk of larger vehicles using it and striking the rail bridge.</p> <p>In addition, no assessment has been undertaken of traffic generation from the proposed town centre and the implications of this on the design</p>	<p>Auckland Transport seeks the following:</p> <p>a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road.</p> <p>b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise.</p> <p>c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location</p>



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

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39.14



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



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

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

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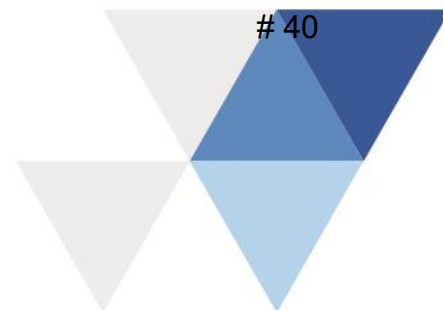
Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
	IX.8.2 <u>Assessment criteria</u>	<u>Oppose in part</u>		Add a new assessment criterion as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads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

39.22

Attachment 2

See attached Auckland Transport submissions on:

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



FORM 5

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

To:	Auckland Council
Name of submitter:	Ministry of Education ('the Ministry')
Address for service:	C/- Beca Ltd 21 Pitt Street Auckland 1010
Attention:	Jess Rose
Phone:	09 308 4565
Email:	jess.rose@beca.com

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

Introduction

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

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

The Ministry of Education's interest in the Drury area

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

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

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

Position on this plan change

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

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

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

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

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

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

Decision sought

The Ministry requests the following decision:

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

Policy IX.3 (2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:

(a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network, ~~and~~ future rail station and schools;

(b) ~~Public open spaces and p~~Pedestrian and cycle linkages to public open spaces and schools;

(c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct;

(d) Key intersections;

(e) The amenity feature of the lake associated with the Town Centre;

(f) Open space areas; and

(g) Key retail and commercial frontages.

- Amendments to ensure there is provision of appropriate public open space to support the surrounding community. 40.2
- The retention of:
 - Standard IX.6.2 Transport Infrastructure Requirements. These standards will help ensure appropriate transport infrastructure is provided prior to significant development occurring in the area. It will also enable greater ability to stage the provision of education facilities as development progresses. 40.3
 - Standard IX.6.4 Site Access. This standard helps protect the functionality and safety of 3m shared footpaths and/or protected cycle lanes to be provided through the plan change area. 40.4
 - The objectives and policies relating to the provision of safe and legible walking and cycling connections through communities as this will decrease reliance on private motor vehicles for travel to and from school and have health and safety benefits for communities. 40.5
- Given the scale of residential development in Drury as a result of this private plan change and the other plan changes in Drury, the Ministry requests regular engagement with Auckland Council and Karaka and Drury Ltd to keep up to date with the housing typologies being proposed, staging and timing of this development so that the potential impact of the plan changes on the school network can be planned for. 40.6
- Any consequential amendments required to give effect to the matters set out in this submission.

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



Jess Rose
Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 22 October 2020

The following customer has submitted a Unitary Plan online submission.

Contact details

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Contact phone number: 09 307 9920

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:
Please see attached submission.

Property address: Please see attached submission.

Map or maps: Please see attached submission.

Other provisions:
Please see attached submission.

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

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

The reason for my or our views are:
Please see attached submission.

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

Details of amendments: Please see attached submission.

Submission date: 22 October 2020

Supporting documents
HNZPT Submission PPC51 - Drury 2 Precinct.pdf



22nd October 2020

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

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PROPOSED PLAN CHANGE 51 (PRIVATE): DRURY 2 PRECINCT

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

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

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

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

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

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

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

- The plan change in its entirety.

4. Heritage New Zealand's submission is:

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

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

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

41.1

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

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

Attend a hearing

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

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

Declaration

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

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

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

No

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

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

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

Yours sincerely

A handwritten signature in blue ink that reads "Sherry Reynolds". The signature is fluid and cursive, with the first name "Sherry" written in a large, sweeping stroke.

Sherry Reynolds
Director Northern Region

Address for Service:

Susan Andrews

PO Box 105 291, Auckland

09 307 9920

sandrews@heritage.org.nz

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

TO: Auckland Council

SUBMITTER: Drury South Limited

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

Introduction

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

Scope of submission

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

Nature of submission

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

Reasons for submission

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

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

Specific reasons for submission

7. Without limiting the generality of paragraph 6 above, DSL is particularly concerned to ensure that the transport effects of PC51 are appropriately managed.
8. Transport was a key consideration through the development of the Drury South Industrial Precinct that has detailed transport provisions including various transport upgrades external to the Precinct to ensure that transport effects are appropriately managed. DSL seeks to ensure that a framework is established under PC51 that similarly and appropriately manages transport effects.
9. Rule IX.6.2 states that:
- All subdivision and development (including construction of any new road) must be undertaken concurrent with the following planned and funded infrastructure OR must not precede the upgrades outlined in Table IX.6.2.1.
10. However, the only upgrade identified in Table IX.6.2.1 is an upgrade to the intersection of State Highway 22 ("SH22") and Jesmond Road whereas the Precinct Plan shows three further intersection upgrades with SH22 as being required. The Burberry Road intersection with SH22 is apparently a requirement of previous stages of the Auranga development. The Precinct Plan suggests that the other two intersections will be upgraded "by others". It is not clear why "others" should be undertaking and funding upgrades to enable and benefit the PC51 area.
11. The transport assessment which supports PC51 seems to assume that the provision and funding of these upgrades will be addressed as part of later development and subdivision processes instead of being directly addressed in the PC51 provisions. As a result the transportation upgrade proposed in Table IX.6.2 is inadequate in scope and nature to ensure that there are not adverse effects on the Drury South Industrial Precinct and the wider road network.

Decision sought

12. DSL seeks confirmation of PC51 subject to Table IX.6.2.1 being amended to include the following additional upgrades: 42.1
- (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection.
- (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.
13. DSL wishes to be heard in support of this submission.

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

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



Signature:	Daniel Minhinnick
Date:	22 October 2020
Address for Service:	C/- Lauren Eaton Russell McVeagh Barristers and Solicitors Level 30 Vero Centre 48 Shortland Street PO Box 8/DX CX10085 AUCKLAND 1140
Telephone:	+64 9 367 8000
Email:	lauren.eaton@russellmcveagh.com

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

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

Submission via email: unitaryplan@aucklandcouncil.govt.nz

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

Background

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

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

¹ As of 30 September 2019

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

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

Scope of Submission

12. The submission relates to PC51 in its entirety.

The Submission is:

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

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

43.1

43.2

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

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

43.2

Relief Sought

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

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

43.1

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

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

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

Dated this 22 day of October 2020



Brendon Liggett
Manager – Development Planning
Kāinga Ora Homes and Communities

ADDRESSES FOR SERVICE:

Campbell Brown Planning Ltd
PO Box 147001
Auckland
Attention: Michael Campbell
Email: michael@campbellbrown.co.nz

Kāinga Ora – Homes and Communities
PO Box 74598
Greenlane, Auckland
Email:
developmentplanning@kaingaora.govt.nz

Attachment 1

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

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

43.1

43.2

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

43.3

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

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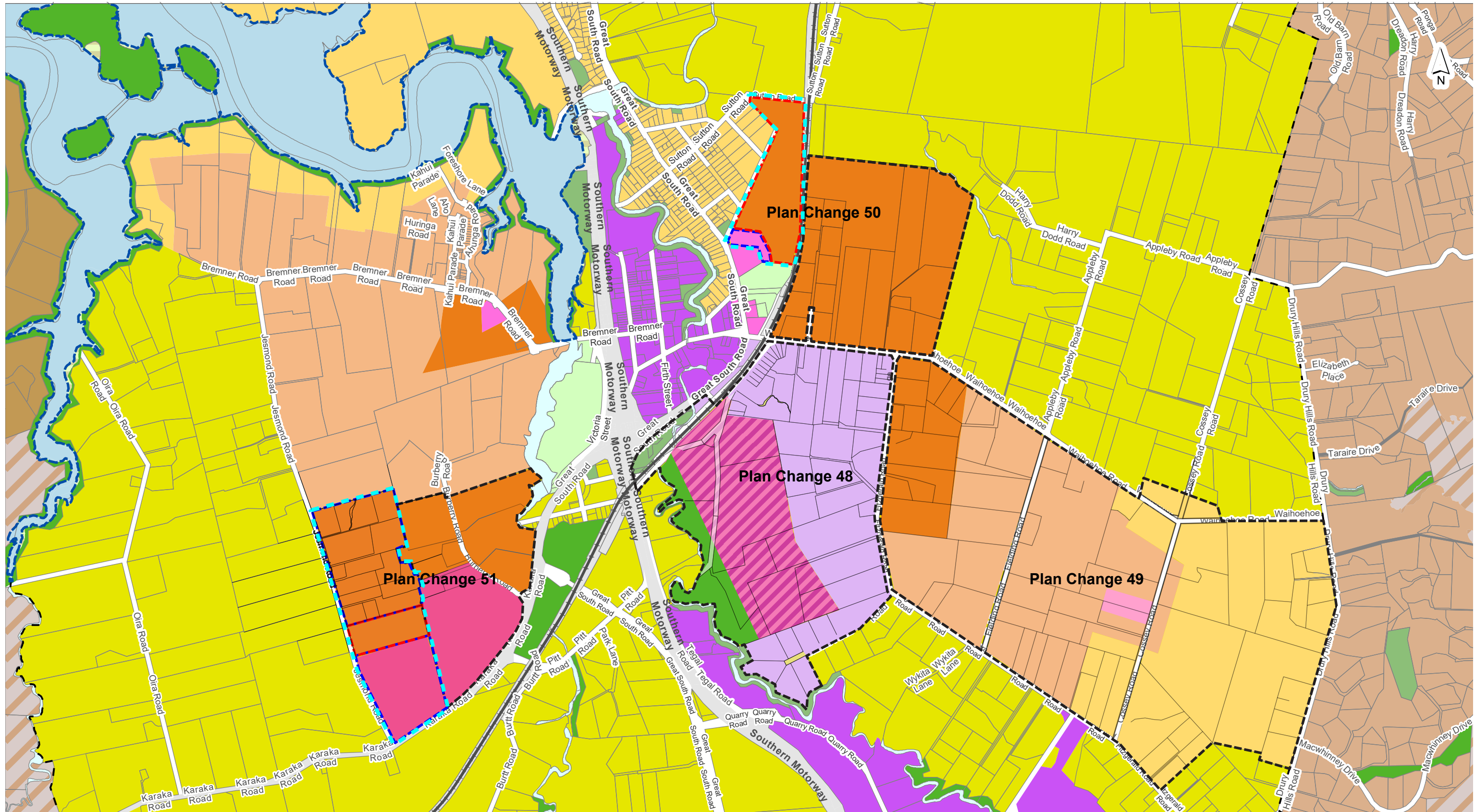
	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
6.	IX.3 Policy 5(b)	Oppose in part	<p><i>within Standard IX.6.2 necessary to support development within the precinct;</i>"</p> <p>Kāinga Ora generally supports the need to ensure subdivision and development is adequately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

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	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
			<p>However, the standard should be reworded to clarify that a planning plan is required:</p> <p><i>“(2) The riparian planting plan (to give effect to compliance with Standard IX-6-3(1)) Any development or subdivision of land that contains a stream must:</i> <i>(a) include a plan identifying the location, species, planting bag size and density of the plants;</i> <i>[...]”</i></p>	



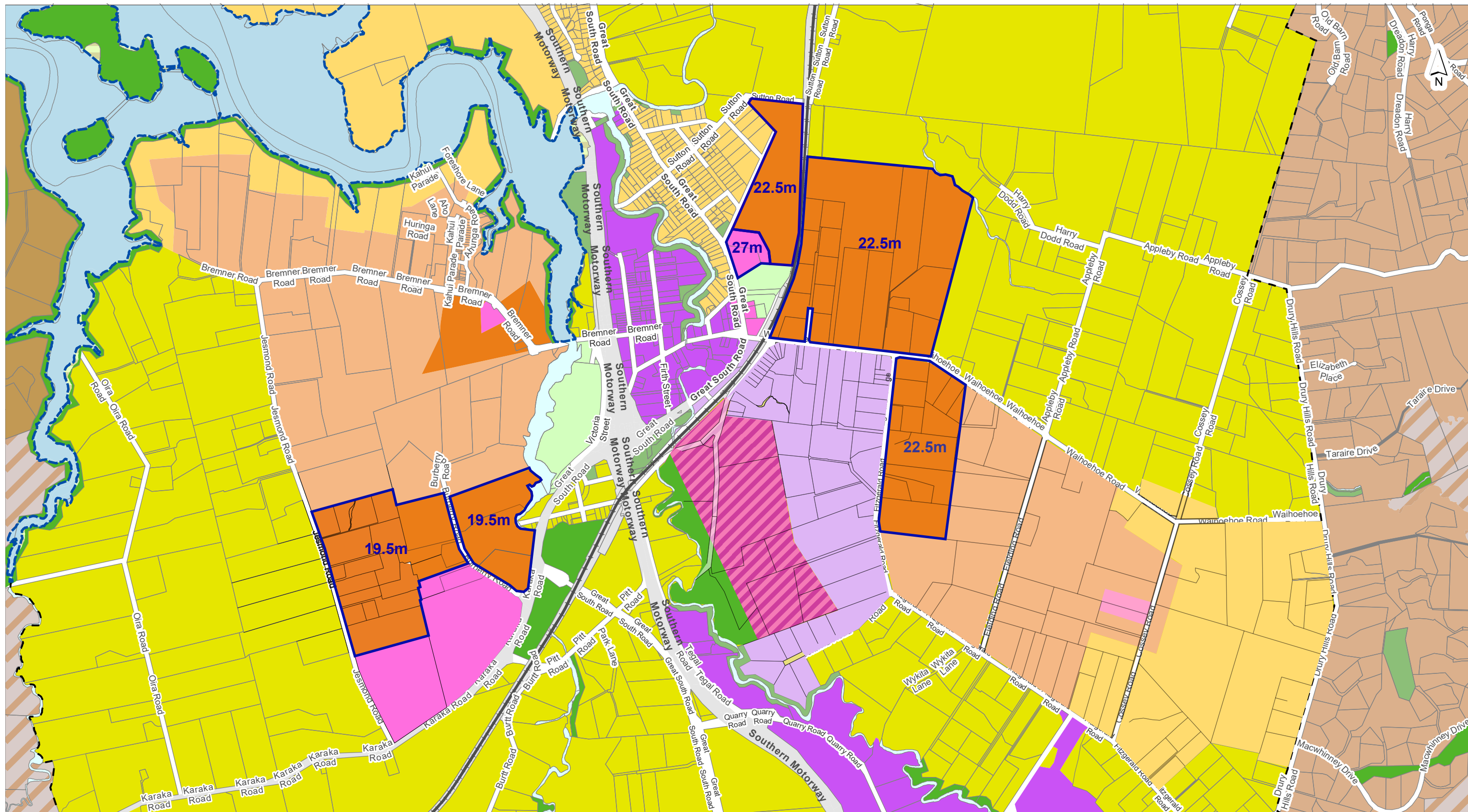
DISCLAIMER:
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Proposed Rezoning Map Plan Change 50 and 51

0 150 300 450
 Meters
Scale @ A3
 = 1:15,000
Date Printed:
 29/09/2020

Legend

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



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Proposed Rezoning Map Height Variation Control

0 150 300 450
Meters

Scale @ A3
= 1:15,000

Date Printed:
29/09/2020

Legend

- Metropolitan Centre Zone
- Mixed Use Zone
- Terraced Housing and Apartment Building Zone
- Mixed Housing Urban Zone
- Mixed Housing Suburban Zone
- Local Centre Zone
- Neighbourhood Centre Zone
- Open Space Zone
- 19.5m Height Variation Control



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

To: Auckland Council

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

INTRODUCTION

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

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

Consultation

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

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

22 October 2020

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



Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
1	1.1	Jennifer Catherine Joyce	tjoyce@xtra.co.nz	Support the plan change
2	2.1	Yu Wang	ppbb6606@gmail.com	Support the plan change with amendments
3	3.1	Fire and Emergency New Zealand c/ Becca Ltd Eloise Tayforth	eloise.tayforth@beca.com	Support the plan change with amendments
4	4.1	God Save The Flag Ltd c/ Wendy Hannah	hannahshouse87@gmail.com	Support the plan change
5	5.1	Rachel and Michael Gilmore	mikejamesgilmore@gmail.com	Decline the plan change, but if approved make the amendment
6	6.1	Britmat Holdings Ltd c/ Integrated Planning Solutions Ltd c/- Paul Sousa	paulsosa@xtra.co.nz	Decline the plan change, but if approved make the amendment
7	7.1	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.2	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.3	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.4	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.5	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.6	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.7	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
7	7.8	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment
8	8.1	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment
8	8.2	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment
8	8.3	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment
9	9.1	Adam Yates	adam@yatez.co.nz	Support the plan change
10	10.1	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change
<p>Summary</p> <p>Approve the plan change.</p> <p>Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.</p> <p>Add new Policy to the Precinct provisions as follows: <ul style="list-style-type: none"> Policy xx: Ensure that development in Drury Centre is coordinated with supporting stormwater, wastewater, and water supply infrastructure. </p> <p>Approve the plan change conditional on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside PC48 area).</p> <p>Approve the plan change.</p> <p>Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.</p> <p>Enable the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status.</p> <p>Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location.</p> <p>That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated;</p> <p>Identify Firstgas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from Firstgas.</p> <p>Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.</p> <p>Add new Objective to the Precinct provisions as follows: The Drury 2 Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled</p> <p>Add new Policy to the Precinct provisions as follows: The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated.</p> <p>Add new Provision to IX 4-6 Activity Table, Notification and Standards requiring the following;</p> <ul style="list-style-type: none"> Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner. <p>In its current form decline the plan change in its entirety.</p> <p>Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.</p> <p>Amend to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'.</p> <p>Approve the plan change.</p> <p>Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consent to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.</p>				

Plan Change 51 - Drury 2 Precinct				
Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
10	10.2	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.mathews@spark.co.nz	Support the plan change
10	10.3	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.mathews@spark.co.nz	Support the plan change
10	10.4	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.mathews@spark.co.nz	Support the plan change
10	10.5	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.mathews@spark.co.nz	Support the plan change
11	11.1	Lomai Properties Limited c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Support the plan change with amendments
12	12.1	Karaka & Drury Consultant Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change
13	13.1	Barflion Investment Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change
14	14.1	DL & WJ Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change
15	15.1	Noah Eastern Limited c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change
16	16.1	Wendy Jao	jaowendy01@gmail.com	Support the plan change
17	17.1	L & W Rising Ltd	yinsangsu@gmail.com	Support the plan change
18	18.1	New Elite Investment Ltd c/- Jing Chen	nelliteinv@gmail.com	Support the plan change
19	19.1	Wang wensheng	13801601535@163.com	Support the plan change
20	20.1	Huawei Development Ltd c/- Wei Pan	wpan008@gmail.com	Support the plan change
21	21.1	Edison Yi	Logicig@gmail.com	Support the plan change
22	22.1	Xibiny Chen	gdszxb@gmail.com	Support the plan change
23	23.1	Jai Glory investment Ltd c/- Hongyan zhao	hongyan-zhao@hotmail.com	Support the plan change
24	24.1	Jia Lili	frankylilija@hotmail.com	Support the plan change
25	25.1	Bremner Estates Development Limited c/- William Zhang	wenyuhilou@msn.com	Support the plan change
26	26.1	Auranga Resident's Association	ara@auranga.co.nz	Support the plan change
27	27.1	Jonxiang Chen	brucechen.stc@gmail.com	Support the plan change
28	28.1	Charles Ma	charles@made.co.nz	Support the plan change
28	28.2	Charles Ma	charles@made.co.nz	Support the plan change with amendments
28	28.3	Charles Ma	charles@made.co.nz	Support the plan change with amendments

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
				<p>Would like to highlight the below key feedback points along with being able to be involved as the plan change develops.</p> <ul style="list-style-type: none"> • Should be a Council lead plan change for consistency, infrastructural changes including roading loadings as existing infrastructure has only just been improved and will very quickly be outdated. Currently the motorway system is not able to cope with the existing loading. • Future urban zone change is expected from Council within 2 years, so why push this through now as a Private Change? • PC6 work doesn't appear to have started, so seems odd that another PC is being started • Need to be involved with the PC51 as plan changes will directly impact our property in the future from decisions being made now. • With the increase in the number of new houses and therefore more water usage, water storage tanks should be considered to minimise water supply issues for Auckland as already seen in 2020. <p>Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.</p> <p>Approve the plan change.</p> <p>Amend Policy 5 (Infrastructure) to the Precinct provisions as follows:</p> <p>(5) Require subdivision and development to:</p> <p>(a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including <u>water</u>, <u>wastewater</u> and transport upgrades;</p> <p>(b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections;</p> <p>(c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of <u>the existing or planned transport, water or wastewater networks</u>; and</p> <p>(d) Promote and develop connections to the future planned public transport facilities.</p> <p>Confirm ongoing iwi participation, consultation and engagement in the project.</p> <p>Acknowledge within the project design the history of Mana Whenua in the PPC51 area.</p> <p>Incorporate Te Aranga Principles in design concepts.</p> <p>Confirm iwi monitoring of the project.</p> <p>Account for natural and cultural landscaping in the project design.</p> <p>Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.</p> <p>Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.</p> <p>Require roof capture for reuse and groundwater recharge.</p> <p>Confirm park edge design adjacent to all waterways.</p> <p>Use native trees and plants only within the precinct.</p> <p>Protect ridgelines, hilltops and wetlands.</p>
29	29.1	Andrew Daken	andrew.daken243@gmail.com	Not specified
30	30.1	Soco Homes Limited c/- Isobel Lee	isobel@topland.co.nz	Support the plan change with amendments
31	31.1	Marmimor Limited	darren@myharveys.co.nz	Support the plan change
32	32.1	Watercare Services Limited c/- Ilze Gotelli	ilze.gotelli@water.co.nz	Neither supports nor opposes the plan change
33	33.1	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.2	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.3	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.4	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.5	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.6	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.7	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.8	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.9	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.10	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment
33	33.11	Ngāi Te Ata Waiohūa c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.12	Ngāi Te Ata Waiohua c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Reflect sustainable development in the design and outcomes.
34	34.1	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opahek Structure Plan.
34	34.2	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Replace all references to 'Town Centre' with 'Local Centre'. Replace all references to Business – Town Centre Zone with Business – Local Centre Zone.
34	34.3	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Reduce the height variation control from 27m to 19.5m.
34	34.4	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.3 Policies 1 & 2 to the Precinct provisions as follows: (1)(b) [second (b)] Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity. Add new activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.
34	34.5	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with: the current and future urban arterial • form and function of State Highway 22 and; the bulk and location that would
34	34.6	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	• support a well-functioning urban arterial.
34	34.7	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required. Amend IX.2 Policy 5(a) to the Precinct provisions as follows:
34	34.8	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	"Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct".
34	34.9	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.2 Policy 5(b) to the Precinct provisions as follows: "Implement the transport network connections and elements as shown on the Precinct Plan (excluding by providing new roads and upgrades of existing roads and intersections)."
35	35.1	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Decline the plan change in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
				Summary Ensure that the council's concerns about bulk infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means: a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Use of prohibited activity status for infringement could be considered. d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing. Include more policies and rules to give full effect to the direction the NPS-FM, including but not limited to Te mana o te wai. Amend Objective IX.2(5) to read: Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to void or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature. 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct. Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read: (1) Activities and subdivision must comply with the Drury X Precinct Plan. Amend policy IX.3 (6)(b) to the Precinct provisions as follows: Incorporate <u>biodiversity</u> enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature. Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.
35	35.2	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.3	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.4	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.5	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.6	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.7	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.8	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
				Summary Add new policies to the Precinct provisions as follows: Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments. <u>Require on-site management, or for higher density development private communal management of stormwater runoff from impervious areas.</u> <u>Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</u> <u>Provide hydrology mitigation through retention, near source or communal detention to manage effects on streams.</u> Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles. Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects. Add a new standard to provide for stormwater quality treatment. Add a new standard to the Precinct provisions as follows: <u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u> Include indicative permanent and intermittent streams and wetlands on the precinct plan. Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment. Retain and amend IX.6.3 (2) to the Precinct provisions by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan. Amend the precinct plan "Future esplanade reserve" to read "Indicative future esplanade reserve". Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission. Ensure that the consent categories in IX.4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement. Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone. Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission Other supporting technical documents may need to be updated to include this change.
35	35.9	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.10	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.11	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.12	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.13	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.14	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.15	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.16	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.17	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment
35	35.18	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
		Auckland Council c/- Christopher Turbott			<p>Add a policy and standard to provide for increased density near RTN stations including:</p> <p>a. Adding a policy to the effect of: Ensure a built form and walkable environment that will provide for a high density of people living working or visiting within an extended walkable radius of a rapid transit network station.</p> <p>b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station.</p> <p>c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height.</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.</p> <p>Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.</p> <p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <p>1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed;</p> <p>2. The impacts of the gas transmission line on the proposed network and associated development patterns;</p> <p>3. The identification of a local network design that can practically accommodate the gas transmission line; and</p> <p>4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.</p> <p>Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.</p> <p>Provide a notable tree assessment and scheduling of any notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.</p> <p>Enable and provide for accessible and affordable social housing for Māori.</p> <p>Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury - Opaheke Structure Plan.</p> <p>Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.</p> <p>Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).</p> <p>That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/inter-section fits with the current and future form and function of State Highway 22.</p> <p>Replace all references within this precinct description from "Town Centre" to "Local Centre".</p> <p>Add a new Objective to the Precinct provisions as follows:</p> <p>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</p>
35	35.19	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	
35	35.20	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	
		Auckland Council c/- Christopher Turbott			
35	35.21	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	
35	35.22	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	
35	35.23	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	
35	35.24	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	
36	36.1	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.2	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.3	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.4	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.5	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.6	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
36	36.7	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Retain other IX.2 objectives. Insert new Policies to the Precinct provisions as follows; Policy X Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network Policy XX Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls. Amend IX.3 Policy 2 to the Precinct provisions as follows: (2)(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity. Retain IX.3 Policies 3 & 4 to the Precinct provisions. Retain IX.3 Policy 5 to the Precinct provisions. Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules. Add a new Activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity. Add a new rule to IX.6.2 Transport Infrastructure Requirements to the Precinct provisions as follows: State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure. Retain IX.6.4 Site Access. Insert activity controls as per attachment 1 to the submission. Insert matter of discretion and assessment criteria as per attachment 1 below to the submission. That the Plan be amended by: (i) A provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, water, wastewater, stormwater and other methods of transport. (ii) That Burberry Road not be stopped until an alternative route is in place. (iii) That the alternative access to Burberry Road be of a standard not less than that currently exists. That any objectives, policies or explanatory passages on which the rules identified above are reliant or based are deleted or amended to the extent necessary in order for Council to appropriately make the amendments sought above. Retain Objective IX.2(4) to the Precinct provisions. Retain Policy IX.3(1)(b) to the Precinct provisions.
36	36.8	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.9	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.10	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.11	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.12	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.13	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.14	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.15	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.16	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
36	36.17	New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	
37	37.1	Elly S Pan c/- Nigel Hosken	nigel@hosken.co.nz	Support the plan change with amendments	
37	37.2	Elly S Pan c/- Nigel Hosken	nigel@hosken.co.nz	Support the plan change with amendments	
38	38.1	Counities Power Limited c/- Jeremy Brydon	jbydon@align.net.nz	Support the plan change with amendments	
38	38.2	Counities Power Limited c/- Jeremy Brydon	jbydon@align.net.nz	Support the plan change	

Plan Change 51 - Drury 2 Precinct				
Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
38	38.3	Countries Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments
38	38.4	Countries Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments
38	38.5	Countries Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments
38	38.6	Countries Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments
39	39.1	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.2	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.3	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Support the Plan Change with amendments
39	39.4	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.5	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.6	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment

Summary

Retain Policy IX.3(5)(a).

Add new policy IX.3.(5)(e) to the Precinct provisions as follows:
Require subdivision and development to:
...
(e) Enable the reduction of CO2 emissions by promoting the use of renewable energy.
Add new policy IX.3(5)(f) to the Precinct provisions as follows:
Require subdivision and development to:
...
(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.

Retain Rules IX.4.1(A1)-(A7).

Decline plan change unless submitter's concerns are addressed including about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed.

Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.

Auckland Transport supports the proposed centre zoning and residential zoning mix provided that the proposed network can accommodate this.

Amend the plan change to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road:

- Vesting and formation of frontage, drainage and carriageway upgrades
- Timing of upgrade requirements
- Funding and delivery of the above work.

Amend the plan change to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to:

- Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it;
- Early active mode access to the proposed new train station;
- Any interim improvements to Karaka Road;
- Introduction of passenger transport services to the Precinct Plan area

Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken.

- Any other transport improvements identified as being required to support proposed development.

Amend the plan change to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
				Summary Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to: <ul style="list-style-type: none">• Carriageway• Footpaths• Cycleways Public Transport (dedicated lanes, geometry etc)• Ancillary Zone (Parking, Public Transport stops, street trees)• Berm• Frontage• Building Setback• Design Speed.
39	39.7	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.8	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.9	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.10	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.11	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.12	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.13	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.14	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
39	39.15	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment
				Amend the plan change to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles. Amend the plan change to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes. Replace the references to cycle and 3m shared paths with a reference to "separated cycle paths on both sides". Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate to any additional reserve networks arising from submissions. a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is capable of accommodating buses. a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road. b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise. c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process. Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road. Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others". Amend the Precinct Plan and zoning as required to address the issue raised.

Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
39	39.16	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	The following assessment is sought along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line. a) Why the approach adopted for the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed. b) The impacts of the gas transmission line on the proposed network and associated development patterns. c) The identification of a local road and reserve network design that can practically accommodate the gas transmission line.
39	39.17	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation.
39	39.18	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.
39	39.19	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Make necessary amendments to the plan change as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.
39	39.20	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new Policy to the Precinct provisions as follows: Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.
39	39.21	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: (X) Development that does not comply with IX.6.X Noise Mitigation.
39	39.22	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new assessment criterion to the Precinct provision as follows: The extent to which noise sensitive activities in proximity to arterial roads are managed. Amend Policy IX.3 (2) to the Precinct provision as follows:
40	40.1	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Incorporate the following elements of the Precinct Plan in the design of any subdivision and development: (a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network, and future rail station and schools; (b) Public open spaces and pedestrian and cycle linkages to public open spaces and schools (c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct; (d) Key intersections; (e) The amenity feature of the lake associated with the Town Centre; (f) Open space areas; and (g) Key retail and commercial frontages.
40	40.2	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
40	40.3	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain Standard IX.6.2 Staging of Development with Transport Upgrades.
40	40.4	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain Standard IX.6.4 Site Access.
40	40.5	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.
40	40.6	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Confirm ongoing engagement with Auckland Council and Karaka and Drury Ltd with housing typologies, staging and timing for the project.
41	41.1	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Include provisions within the precinct plan to require archaeological assessment of the area are undertaken by a suitably qualified professional including an evaluation, by a suitably qualified heritage consultant of the wider heritage landscape through the resource consenting process.
41	41.2	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents, as assessed by a professionally qualified archaeologist.
41	41.3	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Include appropriate provisions within the precinct plan to address any Maori cultural heritage values identified.
41	41.4	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four jointly notified plan changes.
42	42.1	Drury South Limited c/- Lauren Eaton	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades: (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection. (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above. Approve the plan change, subject to: • The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; • The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and • The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone. Approve the plan change, subject to: • the inclusion and application of a 19.5m Height Variation Control in the proposed zoning area; • retaining the spatial extent of the precinct boundaries. Amend Objective 3 to the Precinct provisions as follows: "Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian multi-modal linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities." Amend Policy 4(h) to the Precinct provisions as follows: "Be designed according to incorporate perimeter block principles where car parking is provided behind buildings except for kerbside parking."
43	43.1	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	
43	43.2	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	
43	43.3	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	
43	43.4	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Theme
				Summary
				Amend Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct." Retain Policy 5(b) to the Precinct provisions subject to the following amendment: "Implement the transport network connections and elements as shown on the Precinct Plan including by providing new roads and upgrades of existing roads and intersections." Retain IX.6.2 (1) Transport Infrastructure Requirements provision to the Precinct provisions subject to clarification and/or amendment sought that the phrase "...OR must not precede the upgrades outlined in Table IX.6.2.1" be deleted. Amended the IX.6.3 (2) Riparian Planting provision to the Precinct provisions as follows: "(2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) Any development or subdivision of land that contains a stream must: (a) include a plan identifying the location, species, planting bag size and density of the plants; [...]" Confirm ongoing iwi participation, consultation and engagement in the project. Acknowledge within the project design the history of Mana Whenua in the PPC51 area. Incorporate Te Aranga Principles in design concepts. Confirm iwi monitoring of the project. Account for natural and cultural landscaping in the project design. Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways. Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway. Require roof capture for reuse and groundwater recharge. Confirm park edge design adjacent to all waterways. Use native trees and plants only within the precinct. Protect ridgelines hilltops and wetlands. Reflect sustainable development in the design and outcomes.
43	43.5	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments
43	43.6	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments
43	43.7	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments
43	43.8	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments
44	44.1	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.2	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.3	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.4	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.5	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.6	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.7	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.8	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.9	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.10	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.11	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment
44	44.12	Ngāti Tamaoho c/- Lucie Rutherford	rmaoffice@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment

22 December 2020

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

33 Karaka Street
PO Box 68954
Newton
Auckland 1145
Telephone 64 9 377 4046
Email office@rms.co.nz
Web www.rms.co.nz

Dear Sir/Madam,

RE: FURTHER SUBMISSION IN SUPPORT OF, OR OPPOSITION TO, NOTIFIED (PRIVATE) PLAN CHANGE 51 UNDER CLAUSE 8 OF SCHEDULE 1 – RESOURCE MANAGEMENT ACT 1991.

The Catholic Diocese of Auckland is a submitter to Auckland Council notified Plan Change 51 and has an interest greater than the interest of the general public in the matters associated with the Plan Change. The Catholic Diocese of Auckland owns land at 485 Burt Road on which it is presently developing a secondary college.

The Catholic Diocese of Auckland wishes to make further submissions in support of, or opposition to, submissions as set out in the **attached** matrix.

The Catholic Diocese of Auckland wishes to be heard in support of its submissions and further submissions.

The address for service is as follows:

Resource Management Solutions Limited
P.O. Box 68954
Newton
Auckland
Attention: Matt Feary

Email: matt@rms.co.nz
021 638803.

Yours sincerely,



Resource Management Solutions Ltd
Matt Feary
Director

Further Submission Points on Proposed Private Plan Change 51 to the Auckland Unitary Plan –
 By The Catholic Diocese of Auckland in relation to original submissions as referenced by
 Council:

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
34.1- 34.4, 34.7	Ministry of Housing and Urban Development	Entire Plan Change including Precinct Plan	That the proposed Plan Change be deleted in its entirety, or replace proposed Business – Town Centre Zone with Local Centre Zone with consequential changes to; extent of Zone, building heights, residential zoning, and update associated supporting technical information for review.	Support	Proposed PC51 Town Centre Zone is contrary to Structure Plan and more particularly the West Drury rail station location, with resultant potential land use inefficiencies.	Accept the submission
35.18	Auckland Council	Operative Urban Zoning	Extend operative zoning to eastern side of Jesmond Road to comprise Terrace Housing and Apartment Zone	Support	Enables greater residential density close to the rail station through a more logical zone boundary.	Accept the submission

35.1	Auckland Council	Entire Plan Change	That the Plan Change in its entirety is declined until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and sub-region.	Support/Oppose	There are various funding options associated with potential Plan Change implementation – but with a high degree of uncertainty at this point. It is appropriate infrastructure options are considered as part of the Plan Change assessment process, including options presented by the applicant and public providers.	Accept/Reject the submission.
35.19	Auckland Council	Plan Change 51 Policy	Add policy and standards recognising the importance of high density living within an extended walkable radius of the West Drury Rail station.	Support	Policies will underpin the success of the rail station and ensure adequate supporting infrastructure.	Accept the submission
28.2	Charles Ma	Plan Change 51 Maps/Precinct Plan	Remove Town Centre Zone, rezone to residential as appropriate to facilitate rail station Town Centre to the west.	Support	The submission realigns the Plan Change to the outcomes sought within the Structure Plan and recognises the westward rail station investment.	Accept the submission

36.1, 5, 12	New Zealand Transport Agency	Zone and Precinct Maps	Replace Business Town Centre Zone with Business Local Centre Zone to align with Structure Plan with any associated changes to Precinct Plan.	Support	Proposed PC51 Town Centre Zone is contrary to Structure Plan and more particularly the West Drury rail station location, with resultant potential land use inefficiencies.	Accept the submission
39.3	Auckland Transport	Business Town Centre Zone	Supports the proposed Town Centre Zone and residential zoning mix providing network can support proposed zone development	Oppose	The Town Centre Zone that Auckland Transport supports is contrary to Auckland Councils Structure plan and rail station location so that the business/residential mix cannot be properly considered unless consideration is made based on revised zone locations.	Reject the submission
40.1	Ministry of Education	Policy IX.3(2)	Additional Precinct Plan requirements to ensure appropriate Town centre design recognition and provision for linkages to/from schools.	Support	Recognition of the importance of Town centre/school linkages and provision for schools within the broader transport hierarchy is important.	Accept the submission.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Yu Wang

Organisation name:

Full name of your agent: Civix Limited (Attn: Jessica Esquilant)

Email address: jessica@civix.co.nz

Contact phone number: 0212585170

Postal address:
PO Box 5204
Victoria Street West
Auckland 1142

Submission details

This is a further submission to:

Plan change number: Plan Change 51

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

Original submission details

Original submitters name and address:

Yu Wang
18 Brian Slater Way
Stonefields
Auckland 1072

Submission number: 2

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number 2.1

The reasons for my or our support or opposition are:
Refer to attached Planning Memo.

Support for the Plan Change is provided, with amendments requested to the location of a local road shown on the precinct plan.

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:
As above.

Submission date: 27 January 2021

Supporting documents

Planning Memo on behalf of Yu Wang - Plan Change 51 - January 2021.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Yes

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Civix represents Yu Wang, who is the owner of a site which sits within the Plan Change area (being No. 20 Burberry Road).

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

27th January 2021

Auckland Council
Private Bag 92300,
Victoria Street West
Auckland
New Zealand, 1142

RE: Further Submission on Proposed Plan Change 51 (Private): Drury 2 Precinct on behalf of Yu Wang

We write in relation to proposed *Plan Change 51 (Private): Drury 2 Precinct* (referred to herein as “**PC51**”) which was notified for further submissions on 11/12/20. The Plan Change has been requested by Karaka and Drury Limited (referred to herein as “**KDL**”) and was publicly notified by Auckland Council from 27/08/20 – 22/10/20.

This further submission has been prepared on behalf of Yu Wang, who made a submission during the original notification period. Mr. Wang is the owner of a property at 20 Burberry Road, Drury (the “**subject property**”) which has been included in PC51, however he is not party to PC51.

This Planning Memorandum seeks to provide additional assessment in support of the points raised in the original submission by Mr. Wang on 22/09/20 (refer to herein as the “**original submission**”), a copy of which has been included as **Attachment 1**.

1.0 Summary of Matters

The original submission was supportive of PC51 and sought that Council approve PC51, subject to amendments. The amendments sought relate to the alignment of a proposed local road, which is currently shown crossing through the subject property. The additional assessment presented in this memo will contend that:

- There is no requirement to confirm an exact location or alignment of the local road within PC51 at this time as significant areas of Future Urban land will remain, which we expect future Structure Planning exercises will seek to masterplan;
- There is no constraints or requirements for the local road to be established at this specific location or alignment;
- A local road at this location conflicts with the existing dwelling and other site features on the subject property limiting immediate development potential afforded under PC51;
- The road alignment as proposed would isolate a portion of the subject property and potentially prevent functional/logical development of this land in future, and;
- The submitter requests the opportunity to review and consider alternative alignments for the proposed local road.

1.1 Background

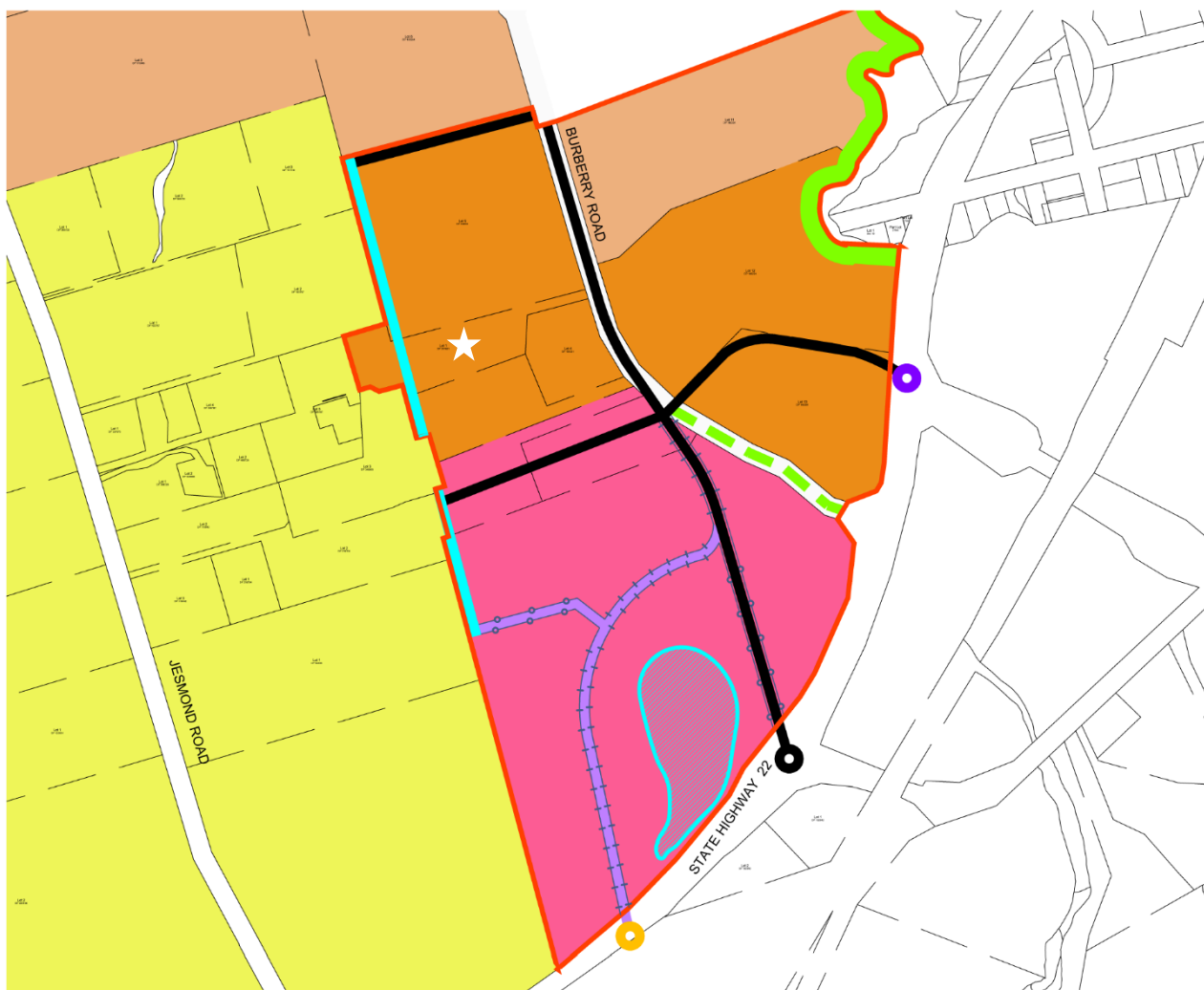
The *Assessment of Environmental Effects* by ‘Tollemache Consultants Ltd’ dated May 2020 as submitted with the documentation supporting PC51 (the “**AEE**”) provides extensive background to the development of PC51, including inputs from various parties and Council directives under the Draft and then Proposed versions of the *Auckland Unitary Plan*, as well as comprehensive assessments of the proposal from various experts.

In this respect, the rationale and overall concept for PC51 is supported, with the exception of the specific matters discussed under section 1.2 below.

Precinct Plan

As part of PC51, a proposed Precinct Plan is included, which seeks to rezone a number of private properties, and amend the road layout of the area including the realignment of Burberry Road and the establishment of new roads. This Precinct Plan has been included as **Attachment 2** for ease of reference and copied below with the subject property identified (refer Figure 1).

Figure 1: PC51 Proposed Precinct Plan, with the Subject Site at 20 Burberry Road starred (refer to Attachment 2 for full plan details)



As shown on the above plan, PC51 seeks the following in relation to the subject property:

- Inclusion within the proposed *Drury 2 Precinct*;
- Rezone the subject property to *Residential – Terrace Housing and Apartment Building Zone*, and;
- To establish a new public road through the site, which is noted on the map as a *Local Road with Cycle and 3m Shared Paths*.

1.2 Submission

As in the original submission, this further submission will dispute the location and alignment of the *Local Road with Cycle and 3m Shared Paths* (refer to herein as the “**local road**”) shown on the proposed Precinct Plan.

The AEE for PC51 provides ample background and justification for the proposed Precinct and Zone structure, which is supported by Mr. Wang. However, the rationale for the local road is unclear. In particular, section 6.9 of the AEE sets out the features of the proposed transport environment shown in PC51, but does not specifically mention or describe the features of the local road which crosses the subject property.

Similarly, the *Integrated Transport Assessment* prepared by ‘Commute Transportation Consultants’ dated 13/055/2020 (the “**ITA**”), and the *Urban Design Assessment* by ‘Ian Munro’ dated May 2020 (the “**UDA**”), do not make any specific reference to this local road. Therefore, it is unclear what purpose it is intended to serve, and its functionality within the surrounding road environment is uncertain at this time.

Given this lack of specific assessment / reference within PC51 supporting documents, it is assumed that the local road seeks to be provide connections between identified collector routes in a more general sense, and it is evident that there is no justification provided for the proposed location or alignment of the local road within the plan change reporting. As such, any local road which traverses this block at an alternative alignment and location would achieve the same outcomes intended by PC51, presumably connections between larger roads which have been subject to more developed and detailed concepts.

As outlined within the AEE, the land within the PC51 area includes flat to gently rolling topography and can be described as: *a highly modified semi-rural lifestyle environment with peripheral rural activities. The Ngakoroa Stream is the dominant natural feature of the wider area, with a portion forming a physical boundary along a portion of the eastern extent of the site.* Aside from this primary stream, there are a number of smaller watercourses through the area. While these features have clearly dictated aspects of the proposed precinct, the area of land surrounding the local road is generally free from constraints.

The local road location shown on the Precinct Plan appears to have been chosen to align with the boundaries of the largest parcels within the vicinity, as a high-level response to structure planning for the area. Given that the local road is a straight line, it is assumed that it has not been specifically designed or aligned in response to the topography or streams. Accordingly, an alternative alignment or location could result in a less intrusive environmental outcomes in terms of the extent of works and visibility within the landscape.

Given the above, it is concluded that there are no constraints or other requirements for the road to be established at this specific location or alignment, as alternate arrangements and potentially better alignments are feasible.

As noted above, the proposed local road is not detailed within the PC51 documentation and therefore it is unclear what the intent is for its implementation, and whether this would be though one of the following methods;

1. The roading works would be undertaken by Auckland Transport or other entity via scheduled roading designations, or;
2. If it is to be included in, and given effect to, as part of any future developments of private properties, in a piecemeal manner.

If method 1 is pursued, the local road would conflict with the existing dwelling and other site features on the subject property and adjoining sites, as shown indicatively in Figure 2. This outcome is not desirable for the existing property owners and residents given the immediate development potential afforded by PC51.

Figure 2: Aerial photograph showing the subject property and indicative location of the proposed local road (source: GIS)



If method 2 is sought, the subject property would essentially be split into two sites, with the western side forming an undersized parcel within the context of the proposed *Residential – Terrace Housing and Apartment Building Zone*, which seeks to undertake more comprehensive developments across larger parent lots. This lot would also have an unusual shape, further constraining any redevelopment potential.

Should the balance portion of the subject property develop (land to the west of the proposed local road), and access is provided across the site, multiple future residents may be deemed affected, compromising intent of the balance Future Urban land. The current road alignment creates a short term development opportunity, that once bisected by the local road may lead to unanticipated outcomes due to differences in development timings.

Therefore, the road alignment as proposed would isolate a portion of the subject property and potentially prevent functional/logical development of this land in future, thereby impeding the high-quality on-site outcomes sought within the Drury 2 precinct.

1.3 Relief Sought

Yu Wang request that KDL review and revise the location and/or alignment of the local road where it intersects the property at No. 20 Burberry Road. It is respectfully requested the proposed local road is located solely on land zoned Future Urban further to the west, so that this can be included in a future masterplan, as this will enable the subject property to develop in accordance with the timings of the remaining land included within PC51.

Mr. Wang welcomes the opportunity to discuss the content of this submission with KDL, with the aim of reaching an amicable solution whereby the considerations identified above are included in Plan Change 51.

Kind Regards



Jessica Esquilant

Senior Planner

Civix Limited – Planning, Engineering and Surveying

0212 585 170

jessica@civix.co.nz

Attachment 1 – Original Submission by Yu Wang

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Yu Wang

Organisation name:

Agent's full name:

Email address: ppbb6606@gmail.com

Contact phone number:

Postal address:
18 Brian Slater Way
stonefields
Auckland 1072

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

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

My submission relates to

Rule or rules:
Drury 2 precinct

Property address: 20 burberry road, Drury west

Map or maps: pc51-attachment 3 precinct plan

Other provisions:

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

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

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

The reason for my or our views are:

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

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

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

Submission date: 22 September 2020

Attend a hearing

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

Declaration

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

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

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

No

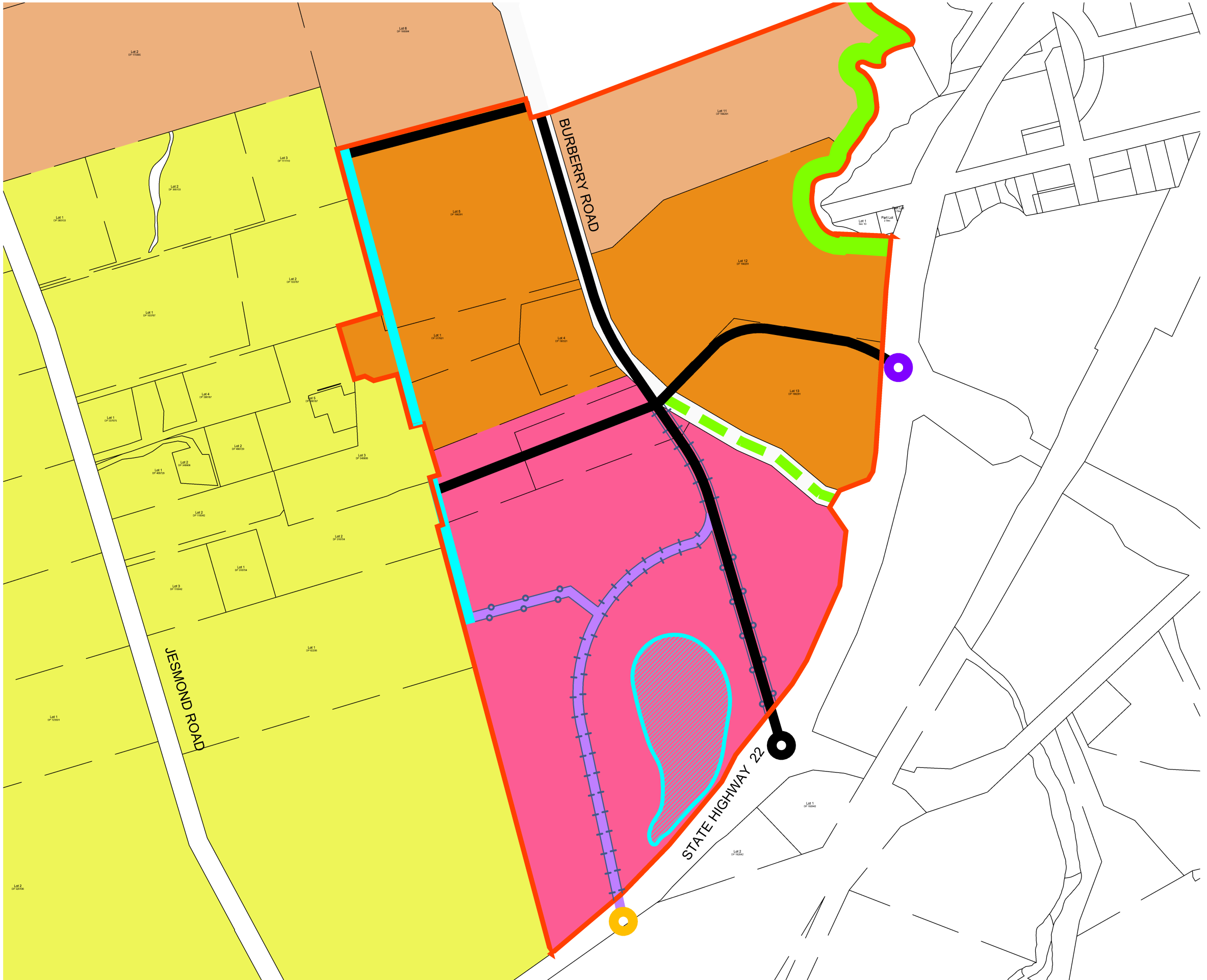
I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Attachment 2 – PC51 Precinct Plan



LEGEND

- COLLECTOR ROAD WITH CYCLE AND 3M SHARED PATHS
- LOCAL ROAD WITH CYCLE AND 3M SHARED PATHS
- TOWN CENTRE LOCAL ROAD
- DRURY 2 PRECINCT BOUNDARY
- SIGNALISED INTERSECTION
- POSSIBLE FUTURE SIGNALISED INTERSECTION WITH UPGRADE TO GREAT SOUTH RD BY OTHERS
- LEFT IN AND OUT INTERSECTION - UPGRADE TO A SIGNALISED INTERSECTION BY OTHERS
- FUTURE ESPLANADE RESERVE
- FUTURE ROAD STOPPING
- EXISTING WATER FEATURE
- CONTROLS: BUILDING FRONTAGE CONTROL - KEY RETAIL FRONTAGE
- CONTROLS: BUILDING FRONTAGE CONTROL - GENERAL COMMERCIAL FRONTAGE



REV	DESCRIPTION	BY	DATE	ORIGINATOR	DATE	SIGNED	PLOT BY	PLOT DATE	SURVEY BY	SURVEY DATE
F	REVISED	NC	04/05/20	JDK	28/02/19					
E	REVISED	NC	07/04/20	DRAWN:	DATE:	SIGNED:				
D	REVISED	NC	18/03/20	JDK	28/02/19					
C	REDRAWN	NC	10/03/20	CHECKED:	DATE:	SIGNED:				
B	BUILDING CONTROLS ADDED	JDK	14/3/19							
A	REVISED	JDK	01/03/19	APPROVED:	DATE:	SIGNED:				

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ALL DIMENSIONS TO BE CHECKED; DO NOT SCALE FROM DRAWING

PROJECT:
**PLAN CHANGE B2
BREMNER ROAD
DRURY**

TITLE:
PRECINCT PLAN



ISSUE STATUS: FOR INFORMATION ONLY		
PROJECT NO: 1823-PC2B	SCALES: 1:2,000 @ A1 1:4,000 @ A3	A1
DRAWING NO: 003	12317	REV: F

29 January 2021

Plans and Places

Auckland Council

Private Bag 92300

Auckland 1142

Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Further submission by Auckland Council on Proposed Private Plan Change 51 – Drury 2 Precinct

Please find attached Auckland Council's further submission to the submissions lodged on Proposed Private Plan Change 51 from Karaka and Drury Limited.

If you have any queries in relation to this further submission, please contact Christopher Turbott on 0212403727 or email christopher.turbott@aucklandcouncil.govt.nz

Yours sincerely

Christopher Turbott
Senior Planner

cc: Simon Berry

Berry Simons

PO Box 3144

Shortland Street

Auckland 1140

Attention: Simon Berry

Via email: simon@berrysimons.co.nz

Encl: Auckland Council's Further Submission on Proposed Private Plan Change 51 – Drury 2 Precinct

Form 6: Further Submission by Auckland Council on Proposed Private Plan Change 51 – Drury 2 Precinct

To: Auckland Council
Private Bag 92300
Auckland 1142

Further submission on: Submissions to Proposed Private Plan Change 51 – Drury 2 Precinct.

From: Auckland Council
Private Bag 92300
Auckland 1142

1. Introduction

1.1 Auckland Council represents a relevant aspect of the public interest and is the local authority responsible for the Auckland Unitary Plan – Operative in Part. It is also a primary funder of infrastructure in Auckland along with other agencies.

2. Scope of further submission

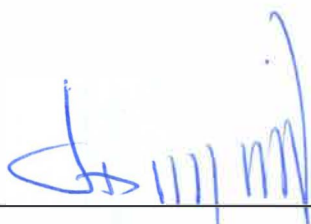
2.1 The specific parts of the submissions opposed are addressed, and the reasons for Auckland Council's position, are set out in **Attachment 1**.

2.2 The decisions which the council seeks in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

3. Appearance at the hearing

3.1 Auckland Council wishes to be heard in support of this further submission.

3.2 If others make a similar further submission, Auckland Council will consider presenting a joint case with them at the hearing.



Signed for and on behalf of Auckland Council

John Duguid

General Manager: Plans and Places

Chief Planning Office

29 January 2021

Address for service of further submitter:

Christopher Turbott

Plans and Places

Auckland Council

Private Bag 92300

Auckland 1142

Email: christopher.turbott@aucklandcouncil.govt.nz



Attachment 1

Submitter	Submission point	Summary of submission	Support or oppose	Reason for AC further submission	Decision sought
8. The Catholic Diocese of Auckland	8.2	Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.	Oppose in part	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability to participate in hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change are modified significantly, supporting documentation such as the Integrated Transport Assessment (ITA) and Stormwater Management Plan (SMP) need to be updated.</p> <p>Relocation of a centre west of Jesmond Road may be outside the scope of the plan change.</p>	<p>Decline the submission unless</p> <ul style="list-style-type: none"> infrastructure funding and timing issues are resolved, land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.

	8.3	<p>Amend the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly supported, and be supported by, a Local neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'.</p>	<p>Oppose in part</p>	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability to participate in hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change is modified significantly, supporting documentation such as the ITA and SMP need to be updated.</p> <p>Relocation of a centre west of Jesmond Road may be outside the scope of the plan change.</p>	<p>Decline the submission unless</p> <ul style="list-style-type: none"> • infrastructure funding and timing issues are resolved, • land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.
28 Charles Ma	28.2	<p>If the Drury West train station is to be located west of the location shown in the Drury-Opāheke Structure Plan (particularly west of Oira Road), support any amendments to</p>	<p>Oppose in part</p>	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability</p>	<p>Decline the submission unless</p> <ul style="list-style-type: none"> • infrastructure funding and timing issues are resolved,

		<p>the change that may be sought by the applicant to address that change. This would include (but is not limited to) rezoning all of the plan change area for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones.</p>		<p>to participate hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change is modified significantly, supporting documentation such as the ITA and SMP need to be updated.</p>	<ul style="list-style-type: none"> land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.
<p>34 Ministry of Housing and Urban Development</p>	<p>34.1</p>	<p>Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opāheke Structure Plan.</p>	<p>Oppose in part</p>	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability to participate in hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change is modified significantly, supporting</p>	<p>Decline the submission unless</p> <ul style="list-style-type: none"> infrastructure funding and timing issues are resolved, land use type and density can be integrated with the public transport and road network as known at

				documentation such as the ITA and SMP need to be updated.	the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.
34.2	Replace all references to "Town Centre" with 'Local Centre' Replace all references to Business - Town Centre Zone with Business - Local Centre Zone.	Oppose in part	Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability to participate in hearing processes on this matter. In addition, if the land uses and extent of the plan change is modified significantly, supporting documentation such as the ITA and SMP need to be updated.	Decline the submission unless <ul style="list-style-type: none"> • infrastructure funding and timing issues are resolved, • land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD. 	

<p>36. New Zealand Transport Agency</p>	<p>36.1</p>	<p>Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury - Opāheke Structure Plan.</p>	<p>Oppose in part</p>	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability to participate in hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change is modified significantly, supporting documentation such as the ITA and SMP need to be updated.</p>	<p>Decline the submission unless</p> <ul style="list-style-type: none"> • infrastructure and funding issues are resolved, • land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.
<p>43 Kāinga Ora Homes and Communities</p>	<p>43.1</p>	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> • The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the 	<p>Support in part</p>	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability</p>	<p>Accept the submission provided that:</p> <ul style="list-style-type: none"> • infrastructure and funding issues are resolved,

		<p>identified location of the future centre under the Drury-Opāheke Structure Plan 2019;</p> <ul style="list-style-type: none"> The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone. 		<p>to participate in hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change is modified significantly, supporting documentation such as the ITA and SMP need to be updated.</p>	<ul style="list-style-type: none"> land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.
<p>43.2</p>	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> the inclusion and application of a 19.5m Height Variation Control in the proposed zoning area; 	<p>Oppose in part</p>	<p>Land use type and density need to integrate with the public transport and road network. However, at the time of writing, there is uncertainty as to where and when key elements of the transport network will be provided. The council wishes to retain the ability</p>	<p>Decline the submission unless</p> <ul style="list-style-type: none"> infrastructure funding and timing issues are resolved, 	

		<ul style="list-style-type: none"> retaining the spatial extent of the precinct boundaries. 		<p>to participate in hearing processes on this matter.</p> <p>In addition, if the land uses and extent of the plan change is modified significantly, supporting documentation such as the ITA and SMP need to be updated.</p>	<ul style="list-style-type: none"> land use type and density can be integrated with the public transport and road network as known at the time of the hearing, in a manner that gives effect to the regional policy statement and the NPSUD.
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The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Barker and Associates

Organisation name: Oyster Capital

Full name of your agent: Barker and Associates

Email address: rachelm@barker.co.nz

Contact phone number: 021638797

Postal address:

Submission details

This is a further submission to:

Plan change number: Plan Change 51

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

Original submission details

Original submitters name and address:
See attached letter.

Submission number: See attached letter.

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number See attached letter.

The reasons for my or our support or opposition are:
See attached letter.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 28 January 2021

Supporting documents
PC51_Further Submission_Oyster_Final.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Proximity of Oyster's land interests on Waihoehoe Road to Plan Change 51.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

28 January 2021

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

Form 6 – Further Submission on a change proposed to the Auckland Unitary Plan (Operative in Part)

Plan Change: PC51 (Private) Drury 2 Precinct

Full name: Oyster Capital
c/o Barker & Associates
Attn: Rachel Morgan

Postal Address: PO 1986, Shortland Street, Auckland 1140

Mobile: +64 021 638 797

Email: Rachelm@barker.co.nz

Oyster Capital (**Oyster**) has an interest in the proposal that is greater than the interest of the general public, given the proximity of Oyster's land interests on Waihoehoe Road to Plan Change 51 (**PC51**). PC51 has the potential to give rise to adverse effects on the environment that would directly affect Oyster.

Oyster supports PC51 overall, particularly the provisions that encourage compact residential development in an accessible location close to public transport and services.

Oyster **wishes to be heard** in support of its further submission.

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



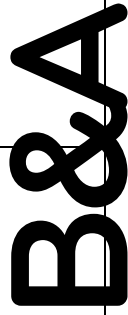
Agent:
Barker & Associates
Rachel Morgan
Senior Associate

PC51 (Private) Drury 2 Precinct – Oyster’s Further Submission

Further Submission Details				
Details of Original Submitter who you are making a further submission on		Details of Further Submission		
Original submitter name	Submission number/ Submission point	Theme	Relief sought as provided in the Summary of Submissions	Support/ Oppose the decision sought
Kainga Ora Homes and Communities	43.1	Support the plan change with amendment	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opaheke Structure Plan 2019; The zoning of 85 Jesmond Road, Drury (owned by Kainga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and amendments Apartment Buildings Zone. 	Oppose
			<p>Oyster supports PC51’s objective to deliver a comprehensive and integrated residential development supported by a centre within walkable distance. However, Oyster do not support the relief sought by Kainga Ora, which will result in a Town Centre of a significant scale locating close to the proposed Metropolitan Centre at Drury East. This has the potential to undermine the function, role and amenity of the primary centre for Drury located in Drury East, as set out in the Drury-Opaheke Structure Plan and as proposed in Plan Change 49.</p> <p>The economic reporting undertaken by Market Economics for Plan Change 49 concludes that the sustainable size of the centre in Drury West is approximately 5 ha (net). A centre of this size would be consistent with the Drury-Opaheke Structure Plan and would ensure that the centre network supports a compact urban form (RPS B2.5.1(2)). Further, we note that the effects of the proposed expansion on the transport network have not been considered.</p>	Oyster seeks the whole (or part) of the submission point be: Disallowed
New Zealand Transport Agency	36.1	Support the plan change with	<p>Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opaheke Structure Plan</p>	Support
			<p>As per comments made above for submission point 43.1. While the Drury-Opaheke Structure Plan does not identify a hierarchy of centres, a 5 ha (net) centre</p>	Allowed



		amendments				(approximately) would be consistent with the scale of development provided for in the Local Centre zone.		
	36.2	Support the plan change with amendments	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.	Support	Support	Oyster supports NZTA's request for all technical documents informing PC51 to be updated to consider the impact of a train station further west. This will ensure that the requirements of s32 of the RMA are met.	Allowed	
	36.5	Support the plan change with amendments	Replace all references within this precinct description from "Town Centre" to 'Local Centre'.	Support	Support	As per comments above.	Allowed	
	36.12	Support the plan change with amendments	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules	Support	Support	As per comments above.	Allowed	
	36.13	Support the plan change with amendments	Add a new Activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity	Support	Support	Oyster supports additional restrictions on large format retail in the proposed Drury West centre. This will support the function, role and amenity of the primary centre in Drury East, particularly in the early stages of development as the centre is establishing.	Allowed	
Ministry of Housing and Urban Development	34.1	Decline the plan change, but if approved make amendment	Replace Business – TCZ with Business – LCZ, and reduce extent of zone to align with Drury-Opaheke Structure Plan	Support	Support	As per comments made above for submission points 43.1 and 36.1.	Allowed	
	34.2	Decline the plan change, but if approved make amendment	Replace all reference to Town Centre with Local Centre Replace all references to Business – TCZ with Business - LCZ	Support	Support	This reinforces the comments made above for submission points 43.1 and 36.1.	Allowed	



34.5	Decline the plan change, but if approved make amendment	Add new activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m ² GFA per tenancy – Discretionary Activity	Support	As per comments made above for submission point 36.13.	Allowed
34.7	Decline the plan change, but if approved make amendment	Update all supporting tech docs to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required	Support	As per comments made above for submission point 36.2.	Allowed
8.2	Decline the plan change, but if approved make amendment	If the plan change is not declined, then amend the plan change so that the town centre is reduced in scale and activity to a local or neighbourhood centre	Support	As per comments made above for submission points 43.1 and 36.1.	Allowed

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Kiwi Property

Organisation name:

Full name of your agent: Barker and Associates (Attn: Rachel Morgan)

Email address: rachelm@barker.co.nz

Contact phone number: 021638797

Postal address:

Submission details

This is a further submission to:

Plan change number: Plan Change 51

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

Original submission details

Original submitters name and address:
Kainga Ora Homes and Communities - see attached letter.

Submission number: 43

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:
Point number 1

The reasons for my or our support or opposition are:
See attached letter.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 28 January 2021

Supporting documents
PC51_Further Submission_Kiwi Property_Final.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Proximity of Kiwi Property's landholdings in Drury East to Plan Change 51 - see attached letter.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

28 January 2021

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

Form 6 – Further Submission on a change proposed to the Auckland Unitary Plan (Operative in Part)

Plan Change: PC51 (Private) Drury 2 Precinct

Full name: Kiwi Property
c/o Barker & Associates
Attn: Rachel Morgan

Postal Address: PO 1986, Shortland Street, Auckland 1140

Mobile: +64 029 666 8330

Email: rachelm@barker.co.nz

Kiwi Property has an interest in the proposal that is greater than the interest the general public given the proximity of Kiwi Property's landholdings in Drury East to Plan Change 51 (**PC51**). Kiwi Property is directly affected by the relief sought by submissions on PC51 as outlined in the table below, as it relates to transport. These effects do not relate to trade competition or the effects of trade competition.

Kiwi Property **wish to be heard** in support of its further submission.

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



Agent:
Barker & Associates
Rachel Morgan
Senior Associate

PC51 (Private) Drury 2 Precinct – Kiwi Property’s Further Submission

Further Submission Details				
Details of Original Submitter who you are making a further submission on		Details of Further Submission		
Original submitter name	Submission number/ Submission point	Theme	Relief sought as provided in the Summary of Submissions	Support/ Oppose the decision sought
Kainga Ora Homes and Communities	43.1	Support the plan change with amendment	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opaheke Structure Plan 2019; The zoning of 85 Jesmond Road, Drury (owned by Kainga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and amendments Apartment Buildings Zone. 	Oppose
			<p>Reasons for support or opposition</p> <p>Kiwi Property opposes Kainga Ora’s request to extend the Business – Town Centre zone to 41 Jesmond Road and expand the Terrace Housing and Apartment Buildings zone to the north of that. The relief sought will significantly increase the extent of zoned land within PC51 and will give rise to adverse effects on the transport network that have not been assessed.</p>	<p>Kiwi Property seeks the whole (or part) of the submission point be:</p> <p>Disallowed</p>



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FORM 6

**Further submission in support of, or in opposition to, submission on a notified proposal for
 Private Plan Change 51 (Drury West) under Clause 8, Schedule 1
 Resource Management Act 1991**

29 January 2021

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

Email: unitaryplan@aucklandcouncil.govt.nz

Name of further submitter: Waka Kotahi NZ Transport Agency (Waka Kotahi)

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

Waka Kotahi is a person who has an interest in the proposal that is greater than the interest of the general public. Waka Kotahi made a submission on the Plan Change dated 22 October 2020.

The specific parts of the submissions supported or opposed and the reasons for that support or opposition are set out in attachment 1. The decisions which Waka Kotahi seeks from the Council in terms of allowing or disallowing submissions are also set out in attachment 1.

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

Signature of person authorised to sign on behalf of further submitter:

A handwritten signature in black ink, appearing to read 'B. Clarke', with a long horizontal stroke extending to the right.

Brendan Clarke
 Senior Planner
 NZ Transport Agency

Address for Service of person making submission:
 Waka Kotahi NZ Transport Agency
 Contact Person: Brendan Clarke
 Email: Brendan.Clarke@nzta.govt.nz

Table 1: Waka Kotahi NZ Transport Agency Further Submission Proposed Plan Change 51 (Private): Drury West

Point #	Name	Email or Post Address	Submission Point	Support/ Oppose	Reason	Relief Sought
2.1	Yu Wang	Ppbb6606@gmail.com	Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.	Oppose	There has been no assessment of the potential traffic effects associated with any expansion of the Plan Change boundaries. Any new land proposed to be rezoned should be properly assessed and subject to normal statutory consideration, including notification and further information requests.	Reject submission point.
7.7	First Gas Limited c/- Zane Wood	Zane.wood@firstgas.co.nz	Add new Policy to the Precinct provisions as follows: <u>The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated</u>	Support	Any future development should be designed so that existing and planned infrastructure can accommodate it.	Accept submission point
8.3	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Amend to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'	Support in part	Waka Kotahi has submitted that the proposed Centre be downscaled to a Town Centre and its spatial extent reduced. However it is acknowledged that a Local Centre may not be compatible with the density of residential zoning provided by the Plan Change as notified. Waka Kotahi maintains its position that, subject to the appropriate assessment being undertaken, a reduced extent/density may be appropriate should the Centre be reduced in scale.	Accept submission point, subject to appropriate assessment being undertaken, including potential traffic effects of reduced density
11.1	Lomai Properties Limited c/- Bill Loutit &	bill.loutit@simpsongrierson.com	Accept the plan change, subject to receiving confirmation that potential traffic effects will be acceptable within the surrounding road network, and that the plan change manages its other infrastructure requirements and will not prevent or hinder the	Support	It is essential that any potential traffic effects associated with the Plan Change are understood, and the Plan Change (including any subsequent changes following notification) can be	Accept submission point

	Simpson Grierson		development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.		accommodated by existing and planned transport infrastructure.	
28.1	Charles Ma	charles@made.co.nz	Approve the plan change as notified if the proposed Town Centre is to be supported by a Drury West train station located as shown in the Drury-Opāheke Structure Plan Area	Oppose in part	Any future Town Centre should be located within a walkable catchment of the Rapid Transit Network, which includes the Drury West Station. Any development within a walkable catchment should be considered and planned in line with the provisions of the NPS:UD.	Ensure that any decision on this submission point is made with consideration to the wider transport network, including the Rapid Transport network. Any material changes to the Plan Change in response to this submission point should be subject to appropriate assessment, including potential traffic effects.
28.2	Charles Ma		If the Drury West train station is to be located west of the location shown in the Drury-Opāheke Structure Plan (particularly west of Oira Road), support any amendments to the change that may be sought by the applicant to address that change. This would include (but is not limited to) rezoning all of the plan change area for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones.	Support in Part	Any future Town Centre should be located within a walkable catchment of the Rapid Transit Network, which follows that the location of any Town Centre should be integrated and planned alongside the planning for any the Drury West Station. However, any changes to the Plan Change in response to a new station location should be subject to normal statutory consideration, including notification and further information requests.	Ensure that any decision on this submission point is made with consideration to the wider transport network, including the Rapid Transport network. Any material changes to the Plan Change in response to this submission point should be subject to appropriate assessment, including potential traffic effects.
30.1	Soco Homes Limited c/- Isobel Lee	isobel@topland.co.nz	Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.	Support in part	It is important that the Plan Change takes into account the wider Structure Plan, however any changes/amendments to the Plan Change should be subject to normal statutory consideration, including	Ensure that any decision on this submission point is made with consideration to the wider transport network, including the Rapid Transport network.

					notification and further information requests.	Any material changes to the Plan Change in response to this submission point should be subject to appropriate assessment, including potential traffic effects.
32.1	Watercare Services Limited c/- Ilze Goteli	Ilze.gotelli@water.co.nz	Amend Policy 5 (Infrastructure) to the Precinct provisions as follows: (5) Require subdivision and development to: (a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including <u>water, wastewater and transport upgrades</u> ; (b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections; (c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of the <u>existing or planned transport, water or wastewater networks</u> ; and (d) Promote and develop connections to the future planned public transport facilities.	Support	It is essential that subdivision and development takes into consideration both existing and planned transport infrastructure.	Accept submission point
34.8	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.zollner@hud.govt.nz	Amend IX.2 Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within <u>Standard IX.6.2 necessary to support development within the precinct.</u> "	Support in part	This Policy should ensure that subdivision and development is integrated with necessary transport infrastructure.	Accept submission point in part, however retain reference to development not preceding required infrastructure provision
34.9	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.zollner@hud.govt.nz	Amend IX.2 Policy 5(b) to the Precinct provisions as follows: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections. "	Support in part	This Policy should ensure that subdivision and development is integrated with necessary transport infrastructure.	Accept submission point in part, however retain reference to the provision of new and upgraded roads and infrastructure
35.17	Auckland Council c/- Christopher Turbott	Christopher.turbott@aucklandcouncil.govt.nz	Ensure that the consent categories in IX4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and	Support	It is important that the Precinct provisions give effect to objectives and policies, the RPS and any National Policy Statement	Accept submission point

35.18	Auckland Council c/- Christopher Turbott	Christopher.turbott@aucklandcouncil.govt.nz	policies of the precinct, the RPS and any national policy statement.	Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone. Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission. Other supporting technical documents may need to be updated to include this change	Oppose in part	There has been no assessment of the potential traffic effects associated with any expansion of the Plan Change boundaries. Any new land proposed to be rezoned should be properly assessed and subject to normal statutory consideration, including notification and further information requests.	Ensure that any decision on this submission point is made with consideration to the wider transport network, including the Rapid Transport network. Any material changes to the Plan Change in response to this submission point should be subject to appropriate assessment, including potential traffic effects.
35.19	Auckland Council c/- Christopher Turbott	Christopher.turbott@aucklandcouncil.govt.nz		Add a policy and standard to provide for increased density near RTN stations including: a. Adding a policy to the effect of: Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station. b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station. c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone; d. Any alterations to other building standards to respond to increased building height. e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.	Support in part	It is unclear what is meant by 'extended walkable catchment'. This term should be defined if referred to in any Policy.	Subject to defining and agreeing the term 'extended walkable catchment', accept the submission point.

39.2	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.	Support in part	It is important that development proceeds in a manner that does not compromise the future form and function of key transport infrastructure.	Amend Plan Change provisions in accordance with second part of submission point.
39.4	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the plan change to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road: <ul style="list-style-type: none"> • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements • Funding and delivery of the above work. 	Support	It is important that development proceeds in a manner that does not compromise the future form and function of key transport infrastructure.	Accept submission point
39.5	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the plan change to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to: <ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new train station; • Any interim improvements to Karaka Road; • Introduction of passenger transport services to the Precinct Plan area • Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. • Any other transport improvements identified as being required to support proposed development 	Support	It is important that development proceeds in a manner that does not compromise the future form and function of key transport infrastructure.	Accept submission point
39.6	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability	Support in part	It is important that development proceeds in a manner that does not compromise the future form and function of key transport infrastructure.	Amend Plan Change provisions in accordance with second part of submission point.

39.7	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.	Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to: • Carriageway • Footpaths • Cycleways Public Transport (dedicated lanes, geometry etc) • Ancillary Zone (Parking, Public Transport stops, street trees) • Berm • Frontage • Building Setback • Design Speed	Support	Waka Kotahi supports the provision of policies and rules which promote walking and cycling.	Accept submission point
39.8	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the plan change to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.	Support	It is important that any development resulting from the Plan Change and be adequately serviced by public transport.	Accept submission point	
39.9	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the plan change to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes	Support	It is important that connectivity between the Plan Change area and the surrounding transport network, including the FTN and RTN, are considered and where appropriate provided for.	Accept submission point.	
39.10	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Replace the references to cycle and 3m shared paths with a reference to “separated cycle paths on both sides”. Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions.	Support	The proposed definition provides more flexibility in the future provision of walking and cycling facilities.	Accept submission point	
39.13	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.	Support	The provision of traffic lights at this proposed intersection should not be proposed without a full ITA and associated traffic modelling	Accept submission point	

39.12	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others".	Support	The Precinct Plan should not refer to the provision of infrastructure by 'others'	Accept submission point
39.17	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation.	Support	It is important that development proceeds in a manner that does not compromise the future form and function of key transport infrastructure.	Accept submission point
39.18	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.	Oppose in part	There has been no assessment of the potential traffic effects associated with any expansion of the Plan Change boundaries. Any new land proposed to be rezoned should be properly assessed and subject to normal statutory consideration, including notification and further information requests.	Ensure that any decision on this submission point is made with consideration to the wider transport network, including the Rapid Transport network. Any material changes to the Plan Change in response to this submission point should be subject to appropriate assessment, including potential traffic effects.
39.21	Auckland Transport c/- Chris Freke	Chris.freke@at.govt.nz	Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: (X) Development that does not comply with IX.6.X Noise Mitigation.	Support in part	Subject to other relief sought by Waka Kotahi in its submission and further submissions being granted, this submission point would ensure that potential reverse sensitivity and health impacts are adequately avoided and/or mitigated.	Accept submission point insofar as it remains consistent with Waka Kotahi original submission points
42.1	Drury South Limited c/- Lauren Eaton	Lauren.eaton@russellmcveagh.com	Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades: (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection. (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.	Oppose in part	It is important that all intersections with SH22 are upgraded to an appropriate standard, however the provision of signals at this location should not be proposed without an ITA and associated traffic modelling	Reject submission point, or alternatively provide additional traffic assessment

43.1	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@cam pbellbrown.co .nz	Approve the plan change, subject to: • The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; • The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and • The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone.	Oppose in part	There has been no assessment of the potential traffic effects associated with any expansion of the Plan Change boundaries. Any new land proposed to be rezoned should be properly assessed and subject to normal statutory consideration, including notification and further information requests	Ensure that any decision on this submission point is made with consideration to the wider transport network, including the Rapid Transport network. Any material changes to the Plan Change in response to this submission point should be subject to appropriate assessment, including potential traffic effects.
43.3	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@cam pbellbrown.co .nz	Amend Objective 3 to the Precinct provisions as follows: “Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian multi-modal linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities.”	Support	Multi-modal linkages are important in contributing to well-functioning urban environments.	Accept submission point
43.5	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@cam pbellbrown.co .nz	Amend Policy 5(a) to the Precinct provisions as follows: “Be sequenced to occur concurrently with the required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to <u>support development within the precinct.</u> ”	Support in part	Subdivision and development should not precede any infrastructure upgrades, including transport upgrades, without consideration of effect.	Accept submission point in part, however retain reference to the provision of new and upgraded roads and infrastructure
43.6	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@cam pbellbrown.co .nz	Retain Policy 5(b) to the Precinct provisions subject to the following amendment: “implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections. ”	Support in part	This Policy should ensure that subdivision and development is integrated with necessary transport infrastructure.	Accept submission point in part, however retain reference to the provision of new and upgraded roads and infrastructure
43.7	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@cam pbellbrown.co .nz	Retain IX.6.2 (1) Transport infrastructure Requirements provision to the Precinct provisions subject to clarification and/or amendment sought that the phrase “...OR must not precede the upgrades outlined in Table IX.6.2.1” be deleted	Support in part	The rules relating to Transport Infrastructure requirements are drafted in a confusing manner and should be redrafted to avoid confusion or interpretation. However, it is not considered that the amended provisions as worded provide the relief sought.	Accept submission point, subject to appropriate amended wording.

29 January 2021

Plans and Places

Auckland Council

Private Bag 92300

Auckland 1142

Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Further submission by Auckland Transport on Proposed Private Plan Change 51 – Drury 2 Precinct

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

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

Yours sincerely



Chris Freke

Principal Planner, Strategic Land Use and Spatial Management

cc:

Berry Simons Environmental Law

PO Box 3144

Shortland Street

Auckland 1140

Attention: Simon Berry

Via email: simon@berrysimons.co.nz

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

Form 6: Further Submission by Auckland Transport on Proposed Private Plan Change 51 – Drury 2 Precinct

To: Auckland Council
Private Bag 92300
Auckland 1142

Further submission on: Submissions to Proposed Private Plan Change 51 – Drury 2 Precinct. This plan change is to rezone approximately 33.65 hectares of land in Drury West from Future Urban zone to 15.29 hectares of Business: Town Centre zone, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings zone and 4.61 hectares of Residential: Residential: Mixed Housing Urban zone, and introduce the Drury 2 Precinct

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 Auckland Transport represents a relevant aspect of the public interest and also has an interest in the proposal that is greater than the interest that the general public has. Auckland Transport's grounds for specifying this are that it is a Council-Controlled Organisation of Auckland Council ('the Council') and Road Controlling Authority for the Auckland region.
- 1.2 Auckland Transport's legislated purpose is "to contribute to an effective, efficient and safe Auckland land transport system in the public interest."

2. Scope of further submission

- 2.1 The specific parts of the submissions supported, opposed or where Auckland Transport has a neutral position providing any transport implications arising from accepting a submission are addressed, and the reasons for Auckland Transport's position, are set out in **Attachment 1**.
- 2.2 The decisions which Auckland Transport seeks from the Council in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

3. Appearance at the hearing

3.1 Auckland Transport wishes to be heard in support of this further submission.

3.2 If others make a similar further submission, Auckland Transport will consider presenting a joint case with them at the hearing.



Signed for and on behalf of Auckland Transport

Christina Robertson

Group Manager: Strategic Land Use and Spatial Management

29 January 2021

Address for service of further submitter:

Chris Freke, Principal Planner
Strategic Land Use and Spatial Management
Auckland Transport
20 Viaduct Harbour Avenue
Auckland Central
Auckland 1010

Email: Chris.Freke@at.govt.nz

Attachment 1

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport submission	Decision sought
2. Yu Wang	2.1	<p>Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.</p> <p>[Auckland Transport's further submission relates to the Submitter's request to change the alignment of proposed road and cycleway which traverses their property which has not been included in the summary of submissions]</p>	Oppose in part	<p>Auckland Transport is concerned that potential changes to proposed roads may affect the ability to ensure an integrated and connected network is achieved through the development process.</p> <p>The alignment also needs to reflect any decisions on relevant aspects of Auckland Transport's submission concerning the transport network contained within the precinct plan.</p>	Decline the submitter's relief, unless it can be demonstrated that any alteration to the alignment does not affect the ability to realise an appropriately located and constructible collector and local road network.
6. Britmat Holdings Ltd	6.1	<p>Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.</p>	Oppose	<p>The submitter's site is located well outside the boundary of the plan change and seeks to apply an urban zone to one property without consideration of the transport effects or immediate network requirements.</p>	Decline the submission.
7. First Gas Limited	7.5	<p>Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.</p>	Support in part	<p>Auckland Transport is supportive of the identification of the Gas Transmission Network on the precinct plans.</p>	Accept the submitter's relief to the extent that there is visibility of the network to plan users along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
					line, including amending PPC51 to identify the Gas Transmission Network on the AUP maps and identify a local road and reserve network design that can practically accommodate the gas transmission line.
	7.8	<p>Add new Provision to IX.4-6 Activity Table, Notification and Standards requiring the following;</p> <ul style="list-style-type: none"> Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner 	Oppose	Auckland Transport is concerned with the potential impact from the submitter's proposed changes to IX.4-6. This creates a buffer zone and obligations which are more onerous than already exists on the titles, through the Pipeline Easement Certificates. Auckland Transport is also unsure of the effect of this change on the proposed road network and development patterns.	That the submitter's proposed increase in buffer zone and more onerous approval requirements than those contained on title easements be declined.
8. The Catholic Diocese of Auckland	8.2	Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.	Oppose in part	Auckland Transport seeks that the Drury West area is supported by appropriate access to services and employment opportunities to reduce transport demands. Further, any alternative zoning needs to be supported by appropriate transport assessment and mitigation as necessary.	Decline the submitter's relief unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change. The plan change should make appropriate provision for the centres required to serve the Drury West and wider area.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
	8.3	Amend the scale and location of the Terrace Housing and Apartment Buildings Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'.	Oppose in part	<p>Auckland Transport seeks that the Drury West area is supported by appropriate access to services and employment opportunities to reduce transport demands.</p> <p>Auckland Transport seeks to ensure that any alternative zoning or amendment to the network is supported by appropriate transport assessment and mitigation as necessary.</p> <p>Auckland Transport supports the need to confirm the general land use zones (including the location and scale of any future centre) and associated transport networks for the areas</p>	<p>Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p> <p>Decline the submitter's relief, unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land/ use economic assessment prior to any provision for such being made in the plan change. The plan change should make appropriate provision for the centres required to serve the Drury West and wider area.</p> <p>Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
11. Lomai Properties Limited	11.1	Accept the plan change, subject to receiving confirmation that potential traffic effects will be acceptable within the surrounding road network, and that the plan change manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.	Oppose in part	adjoining that covered by PPC51 as was undertaken with the development of the Drury-Opāheke Structure Plan. Auckland Transport lodged a submission seeking the plan change be declined unless a number of matters were addressed, including the provision of necessary infrastructure and the funding for this. Auckland Transport supports assessment of traffic/transport effects and confirmation that the plan change will not affect future development of the remainder of the Drury-Opāheke Structure Plan area.	Decline the submitter's relief to approve the plan change, unless Auckland Transport's submission points are appropriately addressed. Accept the submitter's relief to the extent that it seeks identification and resolution of any traffic and transport network impacts and confirmation that the plan change will not hinder the development potential envisaged in the future for the remainder of the Drury-Opāheke Structure Plan.
28. Charles Ma	28.2	If the Drury West train station is to be located west of the location shown in the Drury-Opāheke Structure Plan (particularly west of Oira Road), support any amendments to the change that may be sought by the applicant to address that	Oppose in part	Auckland Transport seeks to ensure that the Drury West area is supported by appropriate access to services and employment opportunities. Further Auckland Transport is concerned that any alternative zoning or	Decline the submitter's relief, unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		change. This would include (but is not limited to) rezoning all of the plan change area for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones.		amendment to the network needs to be supported by appropriate transport assessment and mitigation as necessary.	The plan change should make appropriate provision for the centres required to serve the Drury West and wider area. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.
30. Soco Homes Limited	30.1	Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.	Support	Auckland Transport supports consideration of how the proposed plan change and networks required to support such development integrate with wider Drury Structure plan area.	Accept relief sought in that it seeks proper consideration of infrastructure requirements.
33. Ngati Te Ata Waiohau	33.6	Apply a minimum of 20-metre riparian margin for all waterways especially those to contain walkways / cycleways.	Support in part	The submitter's relief sought is supported by Auckland Transport provided that the associated provisions do not impede the formation of the transport network, including the walking and cycling linkages.	Auckland Transport requests that any potential impact on the proposed transport network (including the walking and cycling linkages) of incorporating riparian margins into the precinct plans be appropriately assessed as part of the plan change process. Any proposed rules and/or associated provisions are to include appropriate provisions for proposed crossings, roads or other transport infrastructure and any consequential changes to the proposed networks depicted within the precinct plan.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
34. Ministry of Housing and Development	34.1	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opapeke Structure Plan.	Oppose in part	Auckland Transport seeks to ensure that the Drury West area is supported by appropriate access to services and employment opportunities. Further any alternative zoning needs to be supported by appropriate transport assessment and mitigation as necessary.	Decline the submitter's relief, unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change. The plan change should make appropriate provision for the centres required to serve the Drury West and wider area. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.
	34.2	Replace all references to "Town Centre" with 'Local Centre' Replace all references to Business – Town Centre Zone with Business – Local Centre Zone.	Oppose in part	Auckland Transport seeks to ensure that the Drury West area is supported by appropriate access to services and employment opportunities. Further any alternative zoning needs to be supported by appropriate transport assessment and mitigation as necessary.	Decline the submitter's relief, unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change. The plan change should make appropriate provision for the centres required to serve the Drury West and wider area. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
	34.6	<p>That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with:</p> <ul style="list-style-type: none"> the current and future urban arterial form and function of State Highway 22 and; the bulk and location that would support a well-functioning urban arterial. 	Support in part	Auckland Transport would be supportive of this material being provided.	Accept relief sought to the extent that it seeks appropriate assessment material on the matters identified and that appropriate consideration is given to any amendments to be made to the plan change where necessary to incorporate agreed outcomes of the analysis of such material. Auckland Transport requests such assessment material be made available for its consideration.
	34.7	<p>Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.</p>	Support in part	Auckland Transport would be supportive of this material being provided.	Support the submitter's suggested relief and amend plan change as required. Auckland Transport requests to be engaged in the drafting of any amendments.
	34.8	<p>Amend IX.2 Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with and not</p>	Oppose in part	Auckland Transport is concerned that the proposed changes are inconsistent with what has been sought in	Decline relief sought to the extent that it does not align with Auckland Transport's submission and would enable development to occur prior to provision of necessary transport infrastructure.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		<p>precede) infrastructure provision, including transport upgrades within <u>Standard IX.6.2 necessary to support development within the precinct.</u></p>		<p>Auckland Transport's submission to PPC51. Auckland Transport does not support development preceding the provision of necessary infrastructure</p>	<p>Provide appropriately scaled transport assessment of staging requirements and mitigation and appropriately reflect within the Precinct Plan provisions.</p>
	34.9	<p>Amend IX.2 Policy 5(b) to the Precinct provisions as follows: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections."</p>	Oppose	<p>Auckland Transport is concerned that the changes proposed by the submitter are inconsistent with what has been sought in Auckland Transport's submission to PPC51. Auckland Transport does not support the removal of the text that provides examples of infrastructure necessary to enable development to occur.</p>	<p>Decline the submitter's relief sought</p>
35. Auckland Council	35.1	<p>Decline the plan change in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region</p>	Support	<p>This relief sought aligns with Auckland Transport's position. There needs to be a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region.</p>	<p>Accept the submitter's relief.</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport submission	Decision sought
	35.2	<p>Ensure that the council's concerns about bulk infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <p>a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.</p> <p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust</p>	Support	Submitter's relief sought is consistent with relief sought in Auckland Transport's original submission to PPC51.	Accept the submitter's relief.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
		<p>objective and policy provisions. This could for example include:</p> <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. 			

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
		<ul style="list-style-type: none"> • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Use of prohibited activity status for infringement could be considered. d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing. 			
	35.5	<ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology 	Support in part	Auckland Transport supports options which result in the SMAF 1 overlay requirements not being applied to areas where the Council has determined it is not required as it can have implications for Auckland Transport in its capacity as asset owner and operator of the transport network. Auckland Transport has a preference where existing analysis allows the areas to be defined, to reflect them within the AUP(OIP) Maps controls layer as is the usual convention.	Accept the relief sought to the extent that the plan change includes provisions to clarify how it will be determined which areas are to be subject to or exempt from hydrological mitigation and that consideration be given to the option of the Auckland Unitary Plan maps and controls layers being amended to reflect where the SMAF 1 controls are to be applied within the PPC51 area.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
	35.8	<p>mitigation, similar to that in the Drury 1 precinct.</p> <p>Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.</p>	Support in part	<p>Auckland Transport seeks that the drafting of the stormwater provisions be consistent with those to apply with the Drury East plan changes (PPC48-50). This includes those policies and rules requiring consideration of the operating costs associated with proposed stormwater treatment assets as well as opportunities for consolidation of treatment assets where appropriate.</p>	<p>Auckland Transport seeks that the drafting of the stormwater related provisions be consistent with those to apply with the Drury East plan changes (PPC48-50). This includes those policies and rules requiring consideration of the operating costs associated with proposed stormwater treatment assets as well as opportunities for consolidation of treatment assets where appropriate.</p>
	35.9	<p>Add new policies to the Precinct provisions as follows: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u> <u>Require on-site management, or for higher density development private communal management of</u></p>	Support in part	<p>Auckland Transport seeks that the drafting of the stormwater provisions be consistent with those to apply with the Drury East plan changes (PPC48-50). This includes those provisions requiring consideration of the operating costs associated with proposed stormwater treatment assets as well as opportunities for consolidation of treatment assets where appropriate.</p>	<p>Auckland Transport seeks that the drafting of the stormwater related provisions be consistent with those to apply with the Drury East plan changes (PPC48-50). This includes those provisions requiring consideration of the operating costs associated with proposed stormwater treatment assets as well as opportunities for consolidation of treatment assets where appropriate.</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
		<p><u>stormwater runoff from impervious areas. Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</u></p> <p><u>Provide hydrology mitigation through retention, near source of communal detention to manage effects on streams.</u></p> <p><u>Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.</u></p> <p><u>Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects</u></p>			
	35.10	Add a new standard to provide for stormwater quality treatment.	Support in part	Auckland Transport seeks that the drafting of the stormwater provisions be consistent with those to apply with the Drury East plan	Auckland Transport seeks that the drafting of the stormwater related provisions be consistent with those to apply with the Drury East plan changes (PPC48-50). This includes those provisions requiring

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
				<p>changes (PPC48-50). This includes those provisions requiring consideration of the operating costs associated with proposed stormwater treatment assets as well as opportunities for consolidation of treatment assets where appropriate.</p>	<p>consideration of the operating costs associated with proposed stormwater treatment assets as well as opportunities for consolidation of treatment assets where appropriate.</p>
	35.12	<p>Include indicative permanent and intermittent streams and wetlands on the precinct plan.</p>	Support in part	<p>Auckland Transport supports early identification of any provisions that may significantly affect the ability to realise the transport networks proposed within a precinct plan as well any consequential changes to the transport networks, or rules applying to them, that arise as a result of granting relief to this submission.</p>	<p>That any potential impact on the proposed transport networks of incorporating riparian margins and indicative permanent and intermittent streams and wetlands into the precinct plans be assessed and any consequential changes made to the proposed network; and/or that any rules limiting activities within a proposed riparian margin make appropriate provision for proposed crossings, roads or other transport infrastructure.</p>
	35.18	<p>Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone. Make any consequential amendments to the precinct plan including any</p>	Support in part	<p>Auckland Transport seeks to ensure that any changes to zoning or plan change boundaries are supported by appropriate transport assessment and mitigation as necessary.</p>	<p>Amend plan change as required in line with relief sought provided that any amendments to the proposed zoning and/or development yield are appropriately assessed and addressed as part of an appropriately scaled transport assessment prior to any provision for such being made in the plan change. Impacts on the transport network and demand for transport services must be addressed and</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
		<p>necessary to give effect to other points in this submission. Other supporting technical documents may need to be updated to include this change.</p>			<p>mitigated through plan provisions and/or other appropriate means.</p>
	35.19	<p>Add a policy and standard to provide for increased density near RTN stations including:</p> <ul style="list-style-type: none"> a. Adding a policy to the effect of: <ul style="list-style-type: none"> Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station. b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7- 	Support in part	<p>Auckland Transport supports the concept of increased densities near RTN stations.</p> <p>However, Auckland Transport is concerned that any alternative zoning or amendment to the network which results in increased yields needs to be supported by an appropriate transport assessment and mitigation as necessary.</p>	<p>Amend plan change as required in line with relief sought provided that any amendments to the proposed zoning and/or development yield are appropriately assessed and addressed as part of an appropriately scaled transport assessment prior to any provision for such being made in the plan change. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
		<p>8 storey building height within about an extended walkable radius of the RTN station.</p> <p>c. In areas of more than 7-8 storeys, providing lower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height.</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide</p>			

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
	35.21	<p>for a safe and attractive walkable environment</p> <p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level. The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <ol style="list-style-type: none"> 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed; 	Support in part	Auckland Transport is supportive of additional information being provided on the Gas Transmission Network.	Accept the submitter's relief.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		<p>2. The impacts of the gas transmission line on the proposed network and associated development patterns;</p> <p>3. The identification of a local network design that can practically accommodate the gas transmission line; and</p> <p>4. i</p>			
36.Waka Kotahi New Zealand Transport Agency	36.1	<p>Replace Business – Town Centre Zone with Business – Local Centre Zone and reduce extent of zone to align with Drury - Opaheke Structure Plan.</p>	Oppose in part	<p>Auckland Transport seeks to ensure that the Drury West area is supported by appropriate accesses to services and employment. Further, any alternative zoning, or amendment to the network, needs to be supported by appropriate transport assessment and mitigation as necessary.</p>	<p>Decline the submitter's relief, unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change. The plan change should make appropriate provision for the centres required to serve the Drury West and wider area. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p>
	36.2	Update all supporting technical documents to	Support	Submitter's relief sought is consistent with relief sought	Accept the submitter's relief

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		<p>consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.</p>		<p>in Auckland Transport's original submission to PPC51.</p>	
	36.3	<p>Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).</p>	Support in part	<p>Auckland Transport in general supports the intent of this submission point. However, Auckland Transport considers that such changes may be better addressed in a considered manner rather than wholesale change in order to ensure such new terms are used appropriately and do not result in any consequential issues.</p>	<p>Auckland Transport supports the concept of the plan change being amended as appropriate to address new policy directives, however, requests that any such amendments, if undertaken as part of this plan change process rather than through Council's separate NPS-UD work programme, are through a considered approach to ensure there are no consequential issues created, such as misalignment with terminology definition/understanding used in design standards or codes of practice, or inconsistencies with the rest of the Auckland Unitary Plan.</p>
	36.4	<p>That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form</p>	Support	<p>Submitter's relief sought is consistent with relief sought in Auckland Transport's original submission to PPC51.</p>	<p>Accept the submitter's relief</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		and function of State Highway 22.			
	36.5	Replace all references within this precinct description from "Town Centre" to "Local Centre".	Oppose in part	Auckland Transport seeks to ensure that the Drury West area is supported by appropriate services and employment. Further, any alternative zoning, or amendment to the network, needs to be supported by appropriate transport assessment and mitigation as necessary.	Decline the submitter's relief, unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change. The plan change should make appropriate provision for the centres required to serve the Drury West and wider area. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.
	36.11	Retain IX.3 Policy 5 to the Precinct provisions.	Support	Auckland Transport would be supportive of retaining IX.3 Policy 5.	Accept the submitter's relief.
	36.12	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules	Oppose in part	Auckland Transport seeks to ensure that the area is supported by appropriate services and employment. Further, any alternative zoning, or amendment to the network, needs to be supported by appropriate transport	Decline the submitter's relief unless any amendments to the proposed zoning and/or development yield are assessed and addressed as part of an appropriately scaled transport assessment and land use/economic assessment prior to any provision for such being made in the plan change.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
				assessment and mitigation as necessary.	The plan change should make appropriate provision for the centres required to serve the Drury West and wider area. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.
	36.14	<p>Add a new rule to IX.6.2 Transport Infrastructure Requirements to the Precinct provisions as follows:</p> <p><u>State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure.</u></p>	Support	Auckland Transport is supportive of additional staging requirements for transport upgrades	Accept the submitter's relief.
38. Counties Power Limited	38.5	<p>Add a new policy around electric vehicle charging within parking areas:</p> <p>"Require subdivision and development to: (f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional</p>	Support in part	Auckland Transport is in general supportive of measures that will increase the uptake and use of electric vehicles. However, it is concerned that the relief sought extends to the mandatory provision of charging areas within public roads without any	<p>Auckland Transport supports this proposed plan provision to the extent that it applies to private sites.</p> <p>Auckland Transport requests that the proposed policy sought by the submitter does not apply to public roads.</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport submission	Decision sought
40. Ministry of Education		spaces for increased demand when required.”		appropriate standards/guidelines around their design, operation and location.	In the event that the submitter’s relief is granted without this clarification/exclusion, then this must be subject to appropriate standards/guidelines, that are to be developed with or by Auckland Transport, around the design, operation, and location of any electric vehicle charging points located within roads.
	40.4	Retain standard IX.6.4 Site Access	Support	Auckland Transport would be supportive of retaining IX.6.4 (site access).	Accept the submitter’s relief.
	40.5	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.	Support	Auckland Transport would be supportive of retaining these objectives and policies.	Accept the submitter’s relief.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
42. Drury South Limited	42.1	<p>Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades:</p> <p>(a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection.</p> <p>(b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.</p>	Support in part	<p>Auckland Transport agrees that there was a lack of identified upgrades/ staging and requested further staging requirements within its submission and for the references for these upgrades to be undertaken by others to be removed.</p> <p>The upgrade of Great South Road's intersection with SH22, however, is also a staging requirement within Drury South and may not be immediately required to support the Drury West development.</p>	<p>Accept the submitter's relief to the extent that it is in alignment with Auckland Transport's submission.</p> <p>Make any further amendments to the plan change on such upgrade matters if an appropriate transport assessment of staging requirements and mitigation is provided and appropriately reflected within the Precinct Plan provisions.</p>
43. Kainga Ora Homes and Communities	43.1	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> The zoning of 41 Jesmond Road, Drury as Business – Town Centre Zone. This aligns with the 	Oppose in part	Auckland Transport made a submission on this plan change requesting it to be declined unless a number of matters could be addressed.	Decline the submitter's relief to approve the plan change, unless Auckland Transport's submission points are appropriately addressed.

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		<p>identified location of the future centre under the Drury-Opāheke Structure Plan 2019;</p> <ul style="list-style-type: none"> The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone. 		<p>including infrastructure provision and funding.</p> <p>Auckland Transport supports the need to confirm the general land use zones and associated transport networks for the areas adjoining that covered by PPC51.</p> <p>Auckland Transport seeks to ensure that the Drury West area is supported by appropriate access to services and employment opportunities and that the location and scale of centres serving the area are appropriately determined.</p> <p>Further, any alternative zoning, or amendment to the network, needs to be supported by appropriate transport assessment and mitigation, as necessary.</p>	<p>Auckland Transport requests that any amendments to the proposed zoning and/or development yield are appropriately assessed and addressed as part of an appropriately scaled transport assessment in consideration of any differences in transport network demand/impact between the two zones and land use/economic assessment, prior to any provision for such being made in the plan change. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
	43.3	Amend Objective 3 to the Precinct provisions as follows: <i>“Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian multi-modal linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities.”</i>	Support	Auckland Transport is supportive of the proposed changes to objective 3.	Accept the submitter’s relief or other appropriate wording to this effect.
	43.5	Amend Policy 5(a) to the Precinct provisions as follows: “Be sequenced to occur concurrently with and not required infrastructure provision, including transport upgrades within <u>Standard X.6.2 necessary to support development within the precinct.</u> ”	Oppose in part	Auckland Transport is concerned that the proposed changes are inconsistent with what has been sought in Auckland Transport’s submission to PPC51. Auckland Transport does not support development preceding the provision of necessary infrastructure	Decline relief sought to the extent that it does not align with Auckland Transport’s submission and would enable development to occur prior to provision of necessary transport infrastructure. Provide appropriately scaled transport assessment of staging requirements and mitigation and appropriately reflect within the Precinct Plan provisions.
	43.6	Retain Policy 5(b) to the Precinct provisions subject to the following amendment:	Oppose	Auckland Transport is concerned that the proposed changes are inconsistent with what has been sought in	Decline the submitter’s relief sought

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland Transport further submission	Decision sought
		<p>"Implement the transport network connections and elements as shown on the Precinct Plan, retained by providing new roads and upgrades of existing roads and intersections;"</p>		<p>Auckland Transport's submission to PPC51.</p> <p>Auckland Transport does not support the removal of the text that provides examples of infrastructure necessary to enable development to occur.</p>	
	43.7	<p>Retain IX.6.2 (1) Transport infrastructure Requirements provision to the Precinct provisions subject to clarification and/or amendment sought that the phrase "... OR must not precede the upgrades outlined in Table IX.6.2.1" be deleted.</p>	Oppose	<p>Auckland Transport is concerned that the proposed changes are inconsistent with what it has sought within Auckland Transport's submission to PPC51.</p> <p>Auckland Transport does not support development preceding the provision of necessary infrastructure</p>	Decline the submitter's relief.
44. Ngati Tamaoho Trust	44.6	<p>Apply a minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways.</p>	Support in part	<p>The submitter's relief sought is supported by Auckland Transport provided that the associated provisions do not impede the formation of the transport network, including the walking and cycling linkages.</p>	<p>Auckland Transport requests that any potential impact on the proposed transport network (including the walking and cycling linkages) of incorporating riparian margins into the precinct plans be appropriately assessed as part of the plan change process.</p> <p>Any proposed rules and/or associated provisions are to include appropriate provisions for proposed crossings, roads or other transport infrastructure and any</p>

Submitter	Submission point	Summary of submission	Support or oppose	Reason for Auckland further submission	Decision sought
					consequential changes to the proposed networks depicted within the precinct plan.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Counties Power Limited

Organisation name: Counties Power Limited

Full name of your agent: Jeremy Brydon

Email address: jbrydon@align.net.nz

Contact phone number: 092824768

Postal address:
PO Box 147105
Ponsonby
Auckland 1021

Submission details

This is a further submission to:

Plan change number: Plan Change 51

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

Original submission details

Original submitters name and address:
See attached

Submission number: See attached

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number See attached

The reasons for my or our support or opposition are:
See attached

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:
See attached

Submission date: 29 January 2021

Supporting documents
210129_PPC51_Counties-Power-further-submisison.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:
Counties Power is a network utility operator within the plan change area

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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



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

Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

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

Document: Further Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited

File Reference: COUNT038

Version:

Issue 2.0	29 January 2021	For issue
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Distribution:

Rachel Bilbe	Counties Power	Email
AC Policy Team	Auckland Council	Online Submission
Submitters listed on p3	Various	Email



Produced by:

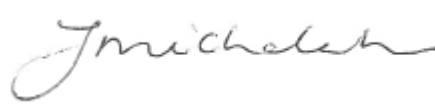
Jeremy Brydon

Align Limited

Date: 29 January 2021

Limitations:

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



Review by:

Jo Michalakis

1. Introduction

This document provides a further submission on Plan Change 51 (Private): Drury 2 Precinct. The document contains a spreadsheet with submission points in relation to the following submitters:

- Fire and Emergency New Zealand
- First Gas
- Spark New Zealand Trading Limited
- Watercare Services Limited
- Ngati Te Ata Waiohua
- Auckland Council
- New Zealand Transport Agency
- Auckland Transport

Counties Power (CP) has an interest in the proposed plan that is greater than the interest the general public has because they own significant electricity infrastructure within the area that is subject to the plan change. Counties Power is therefore able to make a further submission on Plan Change 51. Information about the operation of the Counties Power network is contained in the original submission.

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

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

2. Further submission points

Plan Change 50						
Relevant Provision	Submitter (Submission No.)	Submission Point	Submission "summary"	Support/Oppose	Reason	
New Policy	Fire and Emergency New Zealand – 3	3.1	<p>Add new Policy to the Precinct provisions as follows:</p> <ul style="list-style-type: none"> • <u>Policy xx: Ensure that development in Drury Centre is coordinated with supporting stormwater, wastewater and water supply infrastructure.</u> 	Support with amendments	<p>Counties Power supports the intent of the proposed policy with amendments to include for the provision of electrical, telecommunication and other infrastructure within the policy also as all of these are required for successful, timely and efficient development and subdivision.</p>	
General	First Gas Limited - 7	7.4	<p>Identify First Gas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by First Gas especially land use changes and subdivision, or alternatively the matters of discretion or assessment</p>	Support with amendments	<p>Identify all essential network utility operators as affected parties where there are effects on their assets. This would include but not be limited to electricity, telecommunications, gas, three waters and transport.</p>	

			<p>criteria include technical advice from Firstgas.</p>		
<p>General</p>	<p>First Gas Limited -</p>	<p>7.5</p>	<p>Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.</p>	<p>Support</p>	<p>Identifying the gas transmission network within the planning maps allows easier location of the vital piece of infrastructure running through the plan change area.</p>
<p>General</p>	<p>First Gas Limited -</p>	<p>7.8</p>	<p>Add new Provision to IX.4-6 Activity Table, Notification and Standards requiring the following;</p> <ul style="list-style-type: none"> • Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and • Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner. 	<p>Support</p>	<p>Counties Power acknowledge that the new provision will ensure the continued safe and efficient operation of the Gas Transmission Network alongside other utilities and that this within the precinct should be highlighted for future development within the precinct.</p>

<p>General</p>	<p>Spark New Zealand Trading Limited – 10</p>	<p>10.1</p>	<p>Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD</p>	<p>Support with amendments</p>	<p>Consultation should be carried out with all essential network utility operators to enable efficient development of the proposed precinct.</p>
<p>General</p>	<p>Spark New Zealand Trading Limited – 10</p>	<p>10.2</p>	<p>Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed</p>	<p>Support with amendments</p>	<p>Consultation should be carried out with all essential network utility operators to enable appropriate infrastructure to support expected demand. In addition to this, existing infrastructure should not be adversely affected by reverse sensitivity or through planting/works near existing lines.</p>
<p>General</p>	<p>Spark New Zealand Trading Limited – 10</p>	<p>10.3</p>	<p>Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate</p>	<p>Support with amendments</p>	<p>Consultation should be carried out with all essential network utility operators utilising underground ducting</p>

			and underground ducting, above ground mobile sites/facilities are provided for and designed into the development		within the proposed development area.
General	Spark New Zealand Trading Limited – 10	10.4	Consult with Spark and the other telecommunication network providers to ensure funding is available through the infrastructure funding agreements	Support with amendments	Consultation should be carried out with all essential network utility operators for discussions on funding agreements.
IX.3 (5)	Watercare services Limited – 32	32.1	Amend Policy 5 (Infrastructure) to the Precinct provisions as follows: (5) Require subdivision and development to: (a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including <u>water, wastewater</u> and <u>transport upgrades</u> ;	Support with amendments	Counties Power seek that if specific infrastructure is included into the policy as requested in this submission, provided that it include all vital infrastructure to enable efficient development, then this should include electricity and telecommunications to ensure that projects are not unnecessarily delayed with poorly sequenced work. This should be incorporated into 5(a) and (c).

			<p>(b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections;</p> <p>(c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of the <u>existing or planned transport, water or wastewater networks</u>; and</p> <p>(d) Promote and develop connections to the future planned public transport facilities.</p>		
<p>General</p>	<p>Ngati Te Ata Waiohua – 33</p>	<p>33.9</p>	<p>Confirm park edge design adjacent to all waterways.</p>	<p>Support</p>	<p>The confirmation of park edge design adjacent to waterways would enable Counties Power to have a better understanding of potential adverse effects on any existing and proposed electrical infrastructure.</p>

General	Ngati Te Ata Waiohua – 33	33.10	Use only native trees and plants within the precinct	Support	<p>Counties Power supports the use of native plants. However, consultation should be carried out with Counties Power when planting in the vicinity of electrical infrastructure to ensure compliance with the Electricity (Hazards from Trees) Regulations 2003 and ensure access and minimise detrimental impact on any underground assets.</p>
General	Auckland Council – 35	35.1	Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved.	Neutral	<p>Whilst Counties Power as an infrastructure provider, can supply electricity in conjunction with the developer and does not rely on funding from the Council, Council Controlled Organisations or through ratepayer sources, we do understand the benefits of a coordinated and integrated approach to land use and infrastructure development.</p>

<p>General</p>	<p>Auckland Council – 35</p>	<p>35.23</p>	<p>Provide a notable tree assessment and schedule and notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.</p>	<p>Support with amendments</p>	<p>Ensure that the criteria for scheduling notable trees takes into account the proximity of these trees to critical electricity infrastructure.</p> <p>This is primarily due to the interaction planted areas may have with Counties Power assets.</p> <p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p>
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					<p>Requirements for pruning/removal under this Act may conflict with resource consent requirements/assessment criteria for notable trees.</p>
IX.3 (5)	New Zealand Transport Agency – 36	36.11	Retain IX.3 Policy 5 to the Precinct provisions	Support	<p>Include policy as proposed.</p>
General	Auckland Transport – 39	39.7	<p>Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to:</p> <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways • Public Transport 	Support with amendments	<p>Provision for underground services should be a key provision within the road cross section details as suggested within the request.</p> <p>Diagrams showing general layouts with adequate separation between the different utilities would provide better certainty on this point.</p>

			<ul style="list-style-type: none">• Ancillary Zone (parking, street trees etc.)• Berm• Frontage• Building Setback• Design Speed			
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The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Full name of your agent:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a further submission to:

Plan change number: Plan Change 51

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

Original submission details

Original submitters name and address:
Please see attached further submission.

Submission number: Please see attached further submission.

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number Please see attached further submission.

The reasons for my or our support or opposition are:
Please see attached further submission.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 29 January 2021

Supporting documents

HNZPT Further Submission PPC51 - Drury 2 Precinct FINAL 28 01 21.pdf

HNZPT Further Submission PPC51 - Appendix A FINAL 28 01 21.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



HERITAGE NEW ZEALAND
POUHERE TAONGA

28th January 2021

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

Dear Sir or Madam

FURTHER SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA – PROPOSED PRIVATE PLAN CHANGE 51: DRURY 2 PRECINCT

To: Auckland Council

Name of Submitter: Heritage New Zealand Pouhere Taonga

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

Proposed Private Plan Change 51: Drury 2 Precinct

2. Heritage New Zealand is a person who has an interest in the proposal that is greater than the interest the general public has:

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.

3. Heritage New Zealand supports the submission of:
 - Refer to Appendix A for a list of those submissions which Heritage New Zealand supports.
4. The particular parts of the submission Heritage New Zealand supports are:
 - Refer to Appendix A.
5. The reasons for Heritage New Zealand's support are listed in the table attached as Appendix A.
6. Heritage New Zealand seeks that the whole/part of the submission be allowed as listed in the table in Appendix A.
7. Heritage New Zealand wishes to be heard in support of our further submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Sherry Reynolds', with a stylized flourish at the end.

Sherry Reynolds
Director Northern Region

Address for Service:
Heritage New Zealand Northern Regional Office
PO Box 105 291, Auckland
Telephone: 09 307 9920
Email: PlannerMN@heritage.org.nz
sandrews@heritage.org.nz

Appendix A: Heritage New Zealand Pouhere Taonga Further Submission on Private Plan Change 51 – Drury 2 Precinct

No.	Submitter Details	Support or Oppose	Parts Supported/Opposed	Reasons for Submission	Decision Sought
33.2	Ngāti Te Ata Waiohua bill.loutit@simpsongrierson.com	Support	Acknowledge within the project design the history of Mana Whenua in the area.	Heritage NZ supports Mana Whenua in the exercising of kaitiakitanga and the submission which seeks amendments to PPC51 in response to matters raised in the CVA completed for the area, including that their cultural heritage is reflected in the future development.	Allow Submission
33.3	Ngāti Te Ata Waiohua bill.loutit@simpsongrierson.com	Support	Incorporate Te Aranga Principles in design concepts.	Heritage NZ supports Mana Whenua in the exercising of kaitiakitanga and the submission which seeks amendments to PPC51 in response to matters raised in the CVA completed for the area, including that their cultural heritage is reflected in the future development.	Allow Submission
33.6	Ngāti Te Ata Waiohua bill.loutit@simpsongrierson.com	Support	Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways.	Heritage NZ supports the submission for the reason that riparian margins often contain archaeological sites relating to past Maori. The provision of a wider minimum	Allow Submission

				<p>riparian setback particularly where walking and cycling infrastructure are planned to occur, therefore better provides for the avoidance and retention of such sites. However as per Heritage New Zealand’s original submission the extent of setback (and planting) should be informed by further archaeological assessment to ensure sites yet to be identified are avoided.</p>	
<p>35.16</p>	<p>Auckland Council christopher.turbott@aucklandcouncil.govt.nz</p>	<p>Support</p>	<p>Include indicative open spaces in the precinct plan as shown in Attachment 1 to the submission.</p>	<p>Heritage NZ supports the submission that this will provide for a transparent starting point for discussion, including in relation to the potential for open spaces to encompass historic heritage features located within the area enabling their retention, interpretation and contribution to a sense of place.</p>	<p>Allow Submission</p>

35.22	Auckland Council christopher.turbott@aucklandcouncil.govt.nz	Support	Inclusion of provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development as per recommendations in the CVAs. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.	Heritage New Zealand supports the submission in seeking that mana whenua values and traditions should be reflected in the new development with their participation.	Allow Submission
35.23	Auckland Council christopher.turbott@aucklandcouncil.govt.nz	Support	The provision of a notable tree assessment and scheduling of any notable trees identified in the assessment.	Heritage New Zealand supports the submission in so far as any trees are identified as notable in terms of their historic heritage associations, such as in relation to areas of known historic settlement.	Allow Submission
44.2	Ngāti Tamaoho rmaofficer@tamaoho.maori.nz	Support	Acknowledge within the project design the history of Mana Whenua in the area.	Heritage NZ supports mana whenua in the exercising of kaitiakitanga, and the submission in seeking amendment to the precinct provisions to better reflect cultural heritage values.	Allow Submission
44.3	Ngāti Tamaoho rmaofficer@tamaoho.maori.nz	Support	Incorporate Te Aranga Principles in design concepts.	Heritage NZ supports mana whenua in the exercising of kaitiakitanga, and the submission in seeking amendment to the precinct	Allow Submission

44.6	<p>Ngāti Tamaoho rmaofficer@tamaoho.maori.nz</p>	Support	<p>Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.</p>	<p>provisions to better reflect cultural heritage values.</p>	<p>Allow Submission</p>
<p>Heritage NZ supports the submission for the reason that riparian margins often contain archaeological sites relating to past Maori activity. The provision of a wider minimum riparian setback particularly where walking and cycling infrastructure are planned to occur, therefore better provides for the avoidance and retention of such sites. However as per Heritage New Zealand's original submission the extent of setback (and planting) should be informed by further archaeological assessment to ensure sites yet to be identified are avoided.</p>					

**FURTHER SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PRIVATE
PLAN CHANGE UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE
RESOURCE MANAGEMENT ACT 1991**

TO: Auckland Council

SUBMITTER: Drury South Limited

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

Introduction

1. Drury South Limited ("**DSL**") made a submission on PC51, listed as Submission 42.
2. DSL has an interest in the proposal that is greater than the interest that the general public has given that it owns approximately 257 ha of land within the Drury South Industrial Precinct, located to the south east of the PC51 land.
3. This is a further submission on the submissions on PC51 as set out in the **attached** schedule.
4. For those submissions that DSL supports, DSL supports the relief sought because it:
 - (a) will promote sustainable management of resources, and therefore will achieve the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (b) will meet the reasonably foreseeable needs of future generations;
 - (c) will enable social, economic and cultural wellbeing;
 - (d) will avoid, remedy or mitigate adverse effects on the environment; and
 - (e) represents the most appropriate way to achieve the objectives of the Auckland Unitary Plan, in terms of section 32 of the RMA.
5. For those submissions that DSL takes a neutral position, DSL is interested in the subject matter of the submission but does not, or cannot at this stage based on the information before it, support or oppose the particular relief.
6. DSL wishes to speak to its further submission.
7. DSL could not gain an advantage in trade competition through this further submission.

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



Signature:

Daniel Minhinnick

Date:

29 January 2021

Address for Service:

C/- Lauren Eaton
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Telephone:

+64 9 367 8000

Email:

lauren.eaton@russellmcveagh.com

Submission No	Submitter	Address	Decision sought by submitter	Support/oppose	Reasons for support or opposition
11	Lomai Properties	bill.loutit@simpsongrierson.com	Seeks confirmation that potential traffic effects will be acceptable within the surrounding road network, and that the plan change manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area.	Neutral	DSL seeks to ensure that a framework is established under PC51 that appropriately manages transport effects, including on the surrounding transport network. DSL is interested in this submission to the extent that it would provide greater clarification on the traffic effects of PC51.
30	Soco Homes Limited	isabel@topland.co.nz	Seeks that proper consideration is given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.	Neutral	DSL seeks to ensure that a framework is established under PC51 that appropriately manages transport effects, including on the surrounding transport network. DSL is interested in this submission to the extent that it would provide greater consideration of the transport effects of PC51.
34.6	Ministry of Housing and Urban Development	ernst.zollner@hud.govt.nz	That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with: the current and future urban arterial form and function of State Highway 22 and; the bulk and location that would support a well-functioning urban arterial.	Neutral	DSL seeks to ensure that a framework is established under PC51 that appropriately manages the need for additional transport upgrades. DSL is interested in this submission to the extent that it would provide greater consideration of the need for addition transport upgrades.
34.8			Amend IX.2 Policy 5(a) to the Precinct provisions as follows: Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support <u>development within the precinct;</u>	Neutral	DSL seeks to ensure that a framework is established under PC51 that appropriately manages the need for additional transport upgrades. DSL is interested in this submission to the extent that it would provide greater consideration of the need for addition transport upgrades.

Submission No	Submitter	Address	Decision sought by submitter	Support/oppose	Reasons for support or opposition
35.2	Auckland Council	christopher.turbott@aucklandcouncil.govt.nz	Provide additional evidence and provisions to demonstrate how infrastructure will be provided and funded to support PC51.	Neutral	DSL is concerned to ensure that there is appropriate infrastructure in place to manage the impacts of PC51 in a way that does not adversely affect the wider transport network and developments in the area, such as DSL's development.
36	Waka Kotahi	brendan.clark@nzta.govt.nz	Waka Kotahi has made a comprehensive submission on a range of matters in relation to transport effects.	Neutral	DSL is interested to the extent that the relief sought by Waka Kotahi seeks to ensure that transport effects are appropriately managed and do not adversely affect DSL's development.
37.1;37.2	Elly S Pan	nigel@hosken.co.nz	Seeks the inclusion of a provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, and other methods of transport. As well as that Burberry Road not be stopped until an alternative route is in place with the alternative access to Burberry Road be of a standard not less than that currently exists.	Neutral	DSL is concerned to ensure that there is appropriate infrastructure in place to manage the impacts of PC51 in a way that does not adversely affect the wider transport network and developments in the area, such as DSL's development.
39	Auckland Transport	chris.freke@at.govt.nz	Auckland Transport has made a comprehensive submission seeking amendments to the provisions to ensure that the effects of PC51 on the transport network are appropriately managed.	Neutral	DSL is interested to the extent that the relief sought by Auckland Transport seeks to ensure that transport effects are appropriately managed and do not adversely affect DSL's development.
43.1	Kāinga Ora	michael@campbellbrown.co.nz	Kāinga Ora seeks to rezone property on Jesmond Road within the spatial extent of PC51.	Neutral	DSL is interested to the extent that the relief sought by Kāinga Ora impacts on DSL's development and seeks to ensure that transport effects are appropriately managed and do not adversely affect DSL's development.

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON PROPOSED PLAN CHANGE NO 51: DRURY 2 PRECINCT, AUCKLAND UNITARY PLAN

UNDER CLAUSES 7 AND 8 OF SCHEDULE 1 TO THE RESOURCE MANAGEMENT ACT 1991

To Auckland Council
Name of person making Further submission: Mrs Elly S Pan ("**PAN**"),

This is a further submission in support of, and in opposition to, submissions on the following proposed plan change: Proposed Private Plan Change No 51: Drury 2 Precinct, Auckland Unitary Plan.

The further submissions are contained on the attached sheet.

PAN wishes to be heard in support of its further submission.

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



Signature:

(Signature of person making further submission or person authorised to sign on behalf of person making further submission)

29 January 2021

Date:

Address for Service of Person making further submission:

Hosken & Associates Limited
99 Gloria Avenue
Te Atatu Peninsula
AUCKLAND 0610

Tele: (09) 834 2571
Mob: 0274 770 773
E-mail: nigel@hosken.co.nz
Contact Person: Nigel Hosken, Registered Architect

Note to person making further submission:
A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority

Table 1: Further Submissions - Proposed Plan Change No 51: Drury 2 Precinct - PAN Revision 1				
Council Submission Number	Submitter	Submission	PAN Submission (Support/Oppose)	Reason for Further Submission
32	Watercare	All	Support/Oppose	Support to the extent that infrastructure provision is confirmed and in place prior to development
33	Ngati Te Ata Waiohua	All	Support/Oppose	Support the intention of protecting and enhancing the environment. Oppose the inclusion of rules requiring iwi involvement in all parts of project given that the majority of landowners within plan change never consulted
35	Auckland Council	All	Support/Oppose	With the plan requiring amendment by the Council to this extent clearly does not meet the RMA S32 Test. Plan Change should have been resolved to a higher level by Council on behalf of its community prior to notification and landowners not put to the cost of protecting their interests
36	NZTA	Infrastructure, All	Support/Oppose	These matters should have been resolved prior to Plan Change notification. No development prior to upgrades
38	Counties Power	Infrastructure Provision	Oppose in Part	Counties Power has other means to ensure the particular requirements of its infrastructure. There is no reason to clutter plan changes with duplication of policies and rules
39	Auckland Transport	All	Support/Oppose	Support AT to the extent that roading upgrades are funded and in place prior to development. Oppose to the extent this plan change should have been resolved prior to notification.
41	Heritage NZ	Heritage	Support/Oppose	Supports to the extent that heritage is protected. Indicates Plan poorly prepared. The precinct should have been assessed and sites of interest and further investigation identified on the planning documents.
42	Drury South	Infrastructure	Support/Oppose	Support to extent is attempting to provide for infrastructure upgrades. Oppose as upgrades should be in place prior to development
43	Kainga Ora	All	Support/Oppose	These matters should have been resolved prior to Plan Change notification
44	Ngati Tamaoho	All	Support/Oppose	Support the intention of protecting and enhancing the environment. Oppose the inclusion of rules requiring iwi involvement in all parts of project given that the majority of landowners within plan change never consulted

Further Submission on Plan Change 51 – Drury 2 Precinct (Auranga B2) Precinct, Drury West – Auckland Unitary Plan by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

TO: Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Further submission sent via email: unitaryplan@aucklandcouncil.govt.nz

1. **Kāinga Ora – Homes and Communities (“Kāinga Ora”)** makes this further submission on Plan Change 51 – Drury 2 Precinct (Auranga B2), Drury (“PC51”) in support of/in opposition to original submissions to PC50.
2. Kāinga Ora makes this further submission in respect of submissions by third parties to the Proposed Plan Change provisions to the extent that they directly affect the relief sought in its own submission, which seeks specific amendments to PC51 to, amongst a number of matters stated in its original submission, enable Kāinga Ora to provide for high quality cost effective, state housing to the people in the greatest need for the duration of their need.
3. Kāinga Ora submits the following in reference to the Summary of Decisions Requested (“SDR”) by Auckland Council:
 - (a) The reasons set out in Kāinga Ora 's original submission on PC51.
 - (b) In the case of the Original Submissions that are opposed:
 - (i) The Original Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with

the purpose and principles of the Resource Management Act 1991 (“**RMA**”);

- (ii) The relief sought in the Original Submissions is not the most appropriate in terms of section 32 of the RMA;
 - (iii) Rejecting the relief sought in the Original Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
 - (iv) The Original Submissions are inconsistent with the policy intent of Kāinga Ora’s submission.
- (c) In the case of Original Submissions that are supported:
- (i) The Original Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
 - (ii) The reasons set out in the Original Submissions to the extent that they are consistent with Kāinga Ora’s submission; and
 - (iii) Allowing the relief sought in the Original Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
- (d) Such additional reasons (if any) in respect of each of the Original Submissions supported or opposed as are set out in the **attached** Schedule.
4. The specific relief in respect of each Original Submission that is supported or opposed is set out in the **attached** Schedule derived from Auckland Council’s ‘Summary of Decisions Requested’. Of particular relevance to Kāinga Ora’s further submission:
- (a) Kāinga Ora opposes the inclusion of objectives, policies and specific controls in relation to noise-sensitive activities being required to fully manage reverse sensitivity effects on themselves, within close proximity to State Highways, Rail Network, Arterial Roads and other high-noise generating infrastructure. Kāinga Ora considers that the requested changes result in an unnecessary and overly restrictive burden for landowners, without a corresponding burden on infrastructure providers to manage effects to adjacent land uses generated by the operation of infrastructure. There are more balanced and less onerous

ways in which potential interface issues can be managed, notwithstanding there are noise and vibration standards already present within the Unitary Plan.

- (b) Kāinga Ora is not generally opposed to the identification of 'indicative' streams, green corridors and other key outcomes and features sought to be enabled by the precinct and included by other submitters. However, in Kāinga Ora's experience these features are often administered in a fashion where any deviation from the precinct plan (regardless of a feature being indicative) either triggers a resource consent requirement and/or the location of any feature is 'locked in'. Sufficient clarity of wording should be incorporated into any amended precinct provisions to ensure such situations do not arise in future resource consent processes, should the relief sought by such submissions be granted.

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

DATED 29 January 2021

Kāinga Ora – Homes and Communities



Brendon Liggett

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities
PO Box 74598
Greenlane, Auckland
Attention: Dr Claire Kirman
Email: Claire.Kirman@kaingaora.govt.nz

Copies to:

Kāinga Ora – Homes and Communities
PO Box 74598
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Attention: Gurv Singh
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Campbell Brown Planning Limited
PO Box 147001
Ponsonby, Auckland 1144
Attention: Michael Campbell
Email: Michael@campbellbrown.co.nz

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Fire and Emergency New Zealand c/ Beca Ltd Eloise Taylforth	eloise.taylforth@beca.com	Support the plan change with amendments	Add new Policy to the Precinct provisions as follows: • Policy xx: Ensure that development in Drury Centre is coordinated with supporting stormwater, wastewater, and water supply infrastructure.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Britmat Holdings Ltd c/ Integrated Planning Solutions Ltd c/- Paul Sousa	paulsousa@xtra.co.nz	Decline the plan change, but if approved make the amendment	Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.	Support in part	Kāinga Ora supports the submission for the reasons set out in its original submission.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Enable the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Identify Firstgas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from Firstgas.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.	Oppose	Kāinga Ora opposes the submission. Such infrastructure as described should not be mapped in a District Plan unless they are designated in accordance with Section 176 of the RMA.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Add new Objective to the Precinct provisions as follows: The Drury 2 Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Add new Policy to the Precinct provisions as follows: The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Add new Provision to IX.4-6 Activity Table, Notification and Standards requiring the following: • Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; • Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change	In its current form decline the plan change in its entirety.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its original submission.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment	Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its original submission.
The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment	Amend to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Adam Yates	adam@yatez.co.nz	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Include telecommunications infrastructure within the triggers for the staged release of development.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. Telecommunications infrastructure is not typically controlled through triggers within precinct provisions, and is one of the considerations for infrastructure servicing generally as part of any proposed subdivision.
Lomai Properties Limited c/- Bill Louit & Simpson Grierson	bill.louit@simpsongrierson.com	Support the plan change with amendments	Accept the plan change, subject to receiving confirmation that potential traffic effects will be acceptable within the surrounding road network, and that the plan change manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Karaka & Drury Consultant Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Barflion Investment Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
DL & WJ Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Noah Eastern Limited c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
L & W Rising Ltd	yinsangsu@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
New Elite Investment Ltd c/- Jing Chen	neliteinv@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Huawei Development Ltd c/- Wei Pan	wpan008@gmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Jai Glory investment ltd c/- Hongyan zhao	hongyan-zhao@hotmail.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Bremner Estates Development Limited c/- William Zhang	wenyuhliou@msn.com	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Aurangga Resident's Association	ara@auranga.co.nz	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Charles Ma	charles@made.co.nz	Support the plan change	Approve the plan change as notified if the proposed Town Centre is to be supported by a Drury West train station located as shown in the Drury-Opāheke Structure Plan Area.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Charles Ma	charles@made.co.nz	Support the plan change with amendments	If the Drury West train station is to be located west of the location shown in the Drury-Opāheke Structure Plan (particularly west of Oira Road), support any amendments to the change that may be sought by the applicant to address that change. This would include (but is not limited to) rezoning all of the plan change area for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Charles Ma	charles@made.co.nz	Support the plan change with amendments	Does not support any changes being made to the plan change as notified, except where those changes are agreed to and supported by the applicant.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Soco Homes Limited c/- Isobel Lee	isobel@topland.co.nz	Support the plan change with amendments	Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Marmitor Limited	darren@myharveys.co.nz	Support the plan change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Watercare Services Limited c/- Iize Gotelli	ize.gotelli@water.co.nz	Neither supports nor opposes the plan change	Amend Policy 5 (Infrastructure) to the Precinct provisions as follows: (5) Require subdivision and development to: (a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including water, wastewater and transport upgrades; (b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections; (c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of the existing or planned transport, water or wastewater networks; and	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ngāti Te Aia Waiohūa c/- Bill Loufti & Simpson Grierson	bill.loufti@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Confirm ongoing iwi participation, consultation and engagement in the project.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested

Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Acknowledge within the project design the history of Mana Whenua in the PPC51 area.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Incorporate Te Aranga Principles in design concepts.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Account for natural and cultural landscaping in the project design.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.	Oppose in part	Kāinga Ora opposes the submission. The Unitary Plan generally sets a consistent 10m riparian yard requirement for all streams. Increasing this to 20m may have implications on development potential and would therefore need to be justified through a thorough s32 analysis.
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.	Oppose in part	Kāinga Ora opposes the submission as such matters would be addressed through an NDC and the existing management framework within the AUP(OP).
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Require roof capture for reuse and groundwater recharge.	Oppose in part	Kāinga Ora opposes the submission as such matters would be addressed through an NDC and the existing management framework within the AUP(OP).
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Confirm park edge design adjacent to all waterways.	Oppose in part	Kāinga Ora opposes the submission to the extent that such an approach is overly restrictive, requiring park edge approach to <i>all</i> waterways, and should be considered at future resource consent stage.
Ngāhi Te Ata Waiohua c/-Bill Loutif & Simpson Grierson	bill.loutif@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Use native trees and plants only within the precinct.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its primary submissions.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	
Ngāti Te Aia Waiohū c/- Bill Loufti & Simpson Grierson	bill.loufti@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Protect ridgelines, hilltops and wetlands.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāti Te Aia Waiohū c/- Bill Loufti & Simpson Grierson	bill.loufti@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Reflect sustainable development in the design and outcomes.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opapeke Structure Plan.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Replace all references to "Town Centre" with "Local Centre" Replace all references to Business – Town Centre Zone with Business – Local Centre Zone.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Reduce the height variation control from 27m to 19.5m.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.3 Policies 1 & 2 to the Precinct provisions as follows: (1)(b) [second (b)] Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity. Add new activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with: the current and future urban arterial • form and function of State Highway 22 and; the bulk and location that would support a well-functioning urban arterial	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission. Kāinga Ora is in favour of limiting excessive bulk retail provisions in light of the concurrently notified PC48, 49 and 50.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.2 Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct."	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.2 Policy 5(b) to the Precinct provisions as follows: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections."	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Decline the plan change in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region.</p> <p>Ensure that the council's concerns about bulk infrastructure; funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <p>a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.</p> <p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include:</p> <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. <p>Including more policies and rules to give full effect to the direction the NPS-FM, including but not limited to Te mana o te wai.</p>	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend Objective IX.2(5) to read:</p> <p>Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.</p> <ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct. 	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend Objective IX.2(5) to read:</p> <p>Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.</p> <ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct. 	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission and the national directions within the NPS-FM.
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend Objective IX.2(5) to read:</p> <p>Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.</p> <ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct. 	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend Objective IX.2(5) to read:</p> <p>Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.</p> <ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct. 	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcoun cil.govt.nz	Decline the plan change, but if approved make the amendment	Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read: (1) Activities and subdivision must comply with the Drury X Precinct Plan. Amend policy IX.3 (6)(b) to the Precinct provisions as follows:	Support in part
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcoun cil.govt.nz	Decline the plan change, but if approved make the amendment	Incorporate biodiversity enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature.	Oppose in part
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcoun cil.govt.nz	Decline the plan change, but if approved make the amendment	Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.	Oppose in part
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcoun cil.govt.nz	Decline the plan change, but if approved make the amendment	Add new policies to the Precinct provisions as follows: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u> <u>Require on-site management or for higher density development private communal management of stormwater runoff from impervious areas.</u> <u>Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</u> <u>Provide hydrology mitigation through retention, near source or communal detention to manage effects on streams.</u> <u>Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.</u> <u>Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects.</u> Add a new standard to provide for stormwater quality treatment.	Oppose in part
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcoun cil.govt.nz	Decline the plan change, but if approved make the amendment	Add a new standard to the Precinct provisions as follows: <u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u>	Oppose in part

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested						
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include indicative permanent and intermittent streams and wetlands on the precinct plan.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is a risk that despite the streams being 'indicative' they will 'lock in' a particular stream classification or wetland location.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Retain and amend IX.6.3 (2) to the Precinct provisions by including a cross reference to the matters in Appendix 15.6(3)(b-1) and (4) of the Auckland Unitary Plan.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Amend the precinct plan "Future esplanade reserve" to read " <u>indicative future esplanade reserve</u> ".	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is a risk that despite the streams being 'indicative' they will 'lock in' a particular stream classification or wetland location.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Ensure that the consent categories in IX.4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.	
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission. Other supporting technical documents may need to be updated to include this change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.	

Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested

Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Add a policy and standard to provide for increased density near RTN stations including:</p> <p>a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u></p> <p>b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station.</p> <p>c. In areas of more than 7-8 storeys, providing lower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height.</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.</p> <p>Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.</p> <p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <ol style="list-style-type: none"> 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed; 2. The impacts of the gas transmission line on the proposed network and associated development patterns; 3. The identification of a local network design that can practically accommodate the gas transmission line; and 4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line. <p>Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.</p>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.</p> <p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <ol style="list-style-type: none"> 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed; 2. The impacts of the gas transmission line on the proposed network and associated development patterns; 3. The identification of a local network design that can practically accommodate the gas transmission line; and 4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line. <p>Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.</p>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission. Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.</p> <p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <ol style="list-style-type: none"> 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed; 2. The impacts of the gas transmission line on the proposed network and associated development patterns; 3. The identification of a local network design that can practically accommodate the gas transmission line; and 4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line. <p>Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.</p>	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Enable and provide for accessible and affordable social housing for Māori.	Oppose	Kāinga Ora opposes the submission as it is unclear as to what relief is sought and questions why it is proposed as a policy without any corresponding rules or activities in the precinct provisions. Kāinga Ora also questions why it is worded and limited only to Maori and specific housing types.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury - Opaheke Structure Plan.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. The Structure Plan identifies this as a 'major centre' with no specific reference to a local centre. This may suggest that a local centre is an underutilisation of what the structure plan otherwise intends.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form and function of State Highway 22.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Replace all references within this precinct description from "Town Centre" to 'Local Centre'.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its submission on 36.1.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Add a new Objective to the Precinct provisions as follows: <u>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Retain other IX.2 objectives.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Insert new Policies to the Precinct provisions as follows: <u>Policy X Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network</u> <u>Policy XX Manage the location of sensitive activities (including subdivision) through setbacks, physical barriers and design controls.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policies 3 & 4 to the Precinct provisions.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policy 5 to the Precinct provisions.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested

Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. The Structure Plan identifies this as a 'major centre' with no specific reference to a local centre. This may suggest that a local centre is an underutilisation of what the structure plan otherwise intends.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Add a new Activity to Table IX.4.1 to the Precinct provisions as follows: <u>(A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission. Kāinga Ora is in favour of limiting excessive bulk retail provisions in light of the concurrently notified PC48, 49 and 50.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Add a new rule to IX.6.2 Transport Infrastructure Requirements to the Precinct provisions as follows: <u>State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure.</u>	Support in part	Kāinga Ora supports the submission to the extent delivery of SH22 is confirmed to be a funded NZTA project and/or funding arrangements are clear.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Insert activity controls as per attachment 1 to the submission.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
New Zealand Transport Agency c/- Brendan Clarke	brendan.clark@nzta.govt.nz	Support the plan change with amendments	Insert matter of discretion and assessment criteria as per attachment 1 below to the submission.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
Ely S Pan c/- Nigel Hosken	nigel@hosken.co.nz	Support the plan change with amendments	That the Plan be amended by: (i) A provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, water, wastewater, stormwater and other methods of transport. (ii) That Burberry Road not be stopped until an alternative route is in place. (iii) That the alternative access to Burberry Road be of a standard not less than that currently exists.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ely S Pan c/- Nigel Hosken	nigel@hosken.co.nz	Support the plan change with amendments	That any objectives, policies or explanatory passages on which the rules identified above are reliant or based are deleted or amended to the extent necessary in order for Council to appropriately make the amendments sought above.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Retain Objective IX.2(4) to the Precinct provisions.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change	Retain Policy IX.3(1)(b) to the Precinct provisions.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Retain Policy IX.3(5)(a).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Add new policy IX.3(5)(e) to the Precinct provisions as follows: Require subdivision and development to: ... (e) Enable the reduction of CO2 emissions by promoting the use of renewable energy.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the NPS: UD.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested				
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position
Counties Power Limited c/- Jeremy Brydon	jbydon@align.net.nz	Support the plan change with amendments	Add new policy IX.3(5)(f) to the Precinct provisions as follows: Require subdivision and development to: ... (f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required. Retain Rules IX.4.1(A1)-(A7).	Support in part
Counties Power Limited c/- Jeremy Brydon	jbydon@align.net.nz	Support the plan change with amendments		Support in part
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline plan change unless submitter's concerns are addressed including about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed.	Oppose in part
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.	Oppose in part
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Support the Plan Change with amendments	Auckland Transport supports the proposed centre zoning and residential zoning mix provided that the proposed network can accommodate this.	Support in part
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road: • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements	Oppose in part
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to: • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new train station; • Any interim improvements to Karaka Road; • Introduction of passenger transport services to the Precinct Plan area • Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. • Any other transport improvements identified as being required to support proposed development.	Oppose in part

Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested

Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought. Kāinga Ora opposes the submission. Setting minimum legal road widths may be appropriate to ensure necessary 'space' to provide for planned use of particular transport environments. However, the detailed design or streets should not be prescribed through standards as the submission seeks - rather, a matter for assessment through the resource consent process. Such an approach (as submitted) is likely to conflict with and frustrate the consent process should 'road controlling authority' requirements change (i.e. Auckland Transport Code of Practice).
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to: • Carriageway • Footpaths • Cycleways Public Transport (dedicated lanes, geometry etc) • Ancillary Zone (Parking, Public Transport stops, street trees) • Berm • Frontage • Building Setback • Design Speed.	Oppose	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Replace the references to cycle and 3m shared paths with a reference to "separated cycle paths on both sides".	Oppose	Kāinga Ora opposes the submission. The exact nature of what cycle facility is appropriate (i.e. whether 3m shared, separated or otherwise) should be subject to future assessment within the context of future land development.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions. a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is capable of accommodating	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	<p>a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road.</p> <p>b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise.</p> <p>c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process.</p>	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.	Oppose	Kāinga Ora opposes the submission as such details are better assessed at future resource consent stage on an effects basis.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others".	Oppose	Kāinga Ora opposes the submission as such details are better assessed at future resource consent stage on an effects basis.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan and zoning as required to address the issue raised.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	<p>The following assessment is sought along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.</p> <p>a) Why the approach adopted for the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed.</p> <p>b) The impacts of the gas transmission line on the proposed network and associated development patterns.</p> <p>c) The identification of a local road and reserve network design that can practically accommodate the gas transmission line.</p>	Oppose	Kāinga Ora opposes the submission. The Unitary Plan already contains provisions relating to network utilities which would apply in addition to the proposed precinct provisions.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	<p>That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.</p> <p>Make necessary amendments to the plan change as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.</p>	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new Policy to the Precinct provisions as follows: <u>Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.

Plan Change 51 - Drury 2 Precinct Summary of Decisions Requested					
Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new standard to require that the assessed incident noise level to the facade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: <u>(X) Development that does not comply with IX.6.X Noise Mitigation.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new assessment criterion to the Precinct provision as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Amend Policy IX.3 (2) to the Precinct provision as follows: <u>Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:</u> (a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network, and future rail station and schools; (b) <u>Public open spaces and pedestrian and cycle linkages to public open spaces and schools;</u> (c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct; (d) Key intersections; (e) The amenity feature of the lake associated with the Town Centre; (f) Open space areas; and (g) Key retail and commercial frontages.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the national direction within the NPS:UD.
Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the national direction within the NPS:UD.
Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain Standard IX.6.2 Staging of Development with Transport Upgrades.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Include provisions within the precinct plan to require archaeological assessment of the area are undertaken by a suitably qualified professional including an evaluation, by a suitably qualified heritage consultant of the wider heritage landscape through the resource consenting process.	Oppose in part	Kāinga Ora opposes the submission. If specific archaeological sites are relevant then these should be identified upfront. Blanket archaeological investigation should not be a requirement for all development within the precinct.
Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents, as assessed by a professionally qualified archaeologist.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission and the national direction under the NPS:FM.

**Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested**

Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Drury South Limited c/- Lauren Eaton	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades: (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection. (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. If not supported through evidence, such an upgrade can be assessed at future resource consent stage.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Confirm ongoing iwi participation, consultation and engagement in the project.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Acknowledge within the project design the history of Mana Whenua in the PPC51 area.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Incorporate Te Awaanga Principles in design concepts.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Account for natural and cultural landscaping in the project design.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan generally sets a consistent 10m riparian yard requirement for all streams. Increasing this to 20m may have implications on development potential and would therefore need to be justified through a thorough s32 analysis.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.	Oppose in part	Kāinga Ora opposes the submission. The approach to stormwater management would be assessed through the NDC and SMP process.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Require roof capture for reuse and groundwater recharge.	Oppose in part	Kāinga Ora opposes the submission. The approach to stormwater management would be assessed through the NDC and SMP process.

**Plan Change 51 - Drury 2 Precinct
Summary of Decisions Requested**

Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose Submission
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Confirm park edge design adjacent to all waterways.	Oppose in part	Kāinga Ora opposes the submission to the extent that such an approach is overly restrictive, requiring park edge approach to <i>all</i> waterways, and should be considered at future resource consent stage.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Use native trees and plants only within the precinct.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submissions.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Protect ridgelines hilltops and wetlands.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Reflect sustainable development in the design and outcomes.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of further submissions by
**KARAKA AND DRURY
LIMITED** in respect of **PRIVATE
PLAN CHANGE 51 – DRURY 2
PRECINCT** to the partly
operative Auckland Unitary Plan
("AUP")

**Further Submission on Private Plan Change 51 – Drury 2 Precinct to the
Auckland Unitary Plan**

To: The Chief Executive

Auckland Council,
Private Bag 92300,
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Karaka and Drury Limited

Introduction:

1. This is a further submission on Private Plan Change 51 Drury 2 Precinct ("PPC 51") to the Auckland Unitary Plan – Operative in Part ("AUP") made by Karaka and Drury Limited ("KDL").
2. KDL is the proponent of the private plan change request pursuant to clause 21 of the First Schedule to the RMA that has been notified as PPC 51.
3. Karaka and Drury Consultant Limited (a related company to KDL) made a submission (Submission #12) on the notified version of PPC 51.¹
4. This further submission is made on behalf of KDL **IN SUPPORT OF** Submissions 1-5, 9-28, 30-31, 37-38 and 40, insofar as those submissions all support PPC 51 as a whole being approved.
5. This further submission is made on behalf of KDL **IN OPPOSITION TO** Submissions 2, 6-8, 29, 34-37, 39 and 41-43, insofar as those submissions oppose PPC 51 or seek that the text of PPC 51 be subject to substantive changes if it is approved, as outlined in the table **attached** as **Annexure A**.

¹ Where submission numbers are referred to in this further submission, these correspond to the submission numbers allocated in the Auckland Council document "Auckland Unitary Plan Operative In Part - Proposed Plan Change 51 Drury 2 Precinct - Summary of Decisions Requested".

6. The submissions which KDL wishes to make a further submission on and the reasons for its further submission are outlined at paragraphs 10 -12 below.

Interest in the Submission:

7. In accordance with Schedule 1, Clause 8(1)(b) of the Resource Management Act 1991 ("RMA" or "Act") KDL has an interest in PPC 51 that is greater than the interest that the general public has, in that KDL has an interest in land within the area of PPC 51.
8. KDL could not gain an advantage in trade competition through this further submission.

Reasons for supporting the primary submissions supported by KDL:

9. KDL **SUPPORTS** the further submissions identified in paragraph 4 above on the basis that approving PPC 51 in its current form, as sought by these submitters, represents the most appropriate way to achieve the purpose of the RMA and is consistent with and promotes the purpose of the RMA insofar as PPC 51 will:
 - (a) Enable the social, economic and cultural well-being of the community in the Auckland region and meet the reasonably foreseeable needs of future generations;
 - (b) Appropriately give effect to higher order planning documents; and
 - (c) Ensure adequate infrastructure is provided to service the development, through key infrastructure rules and assessments, in order to appropriately mitigate its potential effects.
10. Other specific reasons are outlined in **Annexure A**.

Reasons for opposing the primary submissions opposed by KDL:

11. KDL **OPPOSES** the submissions identified in paragraph 5 and **Annexure A**, for the following reasons:
 - (a) KDL's position is that some of the relief sought in the primary submissions that KDL opposes is beyond the scope of PPC51 and therefore cannot be granted;
 - (b) The relief sought is contrary to the primary submissions that KDL supports and KDL does not support any changes being made to the PPC 51 as proposed, except where those changes are agreed to and supported by the PPC 51 applicant;
 - (c) The PPC includes key policies and rules to ensure adequate infrastructure is provided to service the development, in order to appropriately mitigate its potential effects; and
 - (d) As further set out in **Annexure A**.

Request to be heard in Support of Further Submission:

12. KDL wishes to be heard in support of its further submission.

13. KDL will consider presenting a joint case at a hearing if others make a similar submission.

DATED at **AUCKLAND** this 29th day of January 2021

KARAKA AND DRURY LIMITED
by their solicitors and duly authorised
agents **BERRY SIMONS:**



S J Berry / H C Andrews

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ANNEXURE A

Proposed Plan Change 51: Further Submissions
Karaka and Drury Limited)

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
6	Brimart Holdings Limited	6.1	Include the property at 1A East Street, Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business – Local Centre Zone to match that of the land adjoining at 200-212 Great South Road
7	First Gas Limited	7.1	Enable the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status.
		7.2	Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location.
		7.3	That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated.
		7.4	Identify First Gas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by First Gas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from First Gas.
		7.5	Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.
		7.6	Add new Objective to the Precinct provisions as follows:
		Oppose / Support	Reasons
		Oppose	KDL opposes any extension to the Plan Change boundary as notified.
		Oppose	PPC51 and the Drury 2 Precinct does not override or alter the AUP Infrastructure provisions in Chapter 26 of the AUP. These contain an enabling activity status for network utilities. There is no need to repeat these in the PPC.
		Oppose	First Gas, as a network utility operator, has the ability under section 176 of the RMA to lodge a Notice of Requirement for its assets to ensure the ongoing protection and approvals which are sought through this PPC process. The pipeline is already legally protected via easements registered on the affected titles. Furthermore, the Drury 2 Precinct is an extension to the existing Drury 1 Precinct. KDL notes that the first gas pipeline runs through the Drury 1 Precinct which has now been subject to two plan change processes and deemed appropriate without the provisions being requested by First Gas. In addition the same pipeline continues further north though the southern portion of Hingaia which is live zoned (via plan variations to the AUP) without the provisions being requested by First Gas. For these reasons KDL does not see any resource management issue for which there is a need to incorporate the changes requested by First Gas.

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
8	The Catholic Diocese of Auckland		The Drury 2 Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled.	Oppose	The Council's Structure Plan, PPC and Section 32 appropriately justifies the need and timing for a plan change, as well as the proposed town centre zoning, and location of the town centre zone.
		7.7	Add new Policy to the Precinct provisions as follows: The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated.		
		7.8	Add new Provision to IX.4-6 Activity Table, Notification and Standards requiring the following: • Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and • Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner.		
29	Andrew Daken	8.1	In its current form, decline the plan change in its entirety.	Oppose in part	The PPC and Section 32 appropriately justifies the need and timing for a plan change and infrastructure needed to align with the development.
		8.2	Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.		
		8.3	Amend to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'		
29	Andrew Daken	29.1	Would like to highlight the below key feedback points along with being able to be involved as the plan change develops. • Should be a Council lead plan change for consistency, infrastructural changes including roading loadings as existing infrastructure has only	Oppose in part	The PPC and Section 32 appropriately justifies the need and timing for a plan change and infrastructure needed to align with the development.

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
34	MHUD	34.1 34.2 34.3 34.4 34.5 34.6	<p>just been improved and will very quickly be outdated. Currently the motorway system is not able to cope with the existing loading.</p> <ul style="list-style-type: none"> • Future urban zone change is expected from Council within 2 years, so why push this through now as a Private Change? • PC6 work doesn't appear to have started, so seems odd that another PC is being started • Need to be involved with the PC51 as plan changes will directly impact our property in the future from decisions being made now. • With the increase in the number of new houses and therefore more water usage, water storage tanks should be considered to minimise water supply issues for Auckland as already seen in 2020. <p>Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opaheke Structure Plan.</p> <p>Replace all references to “Town Centre” with ‘Local Centre’ Replace all references to Business – Town Centre Zone with Business – Local Centre Zone.</p> <p>Reduce the height variation control from 27m to 19.5m.</p> <p>Amend IX.3 Policies 1 & 2 to the Precinct provisions as follows: (1)(b) [second (b)] Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.</p> <p>Add new activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.</p> <p>That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and</p>	Oppose	<p>The Council's Structure Plan, PPC and Section 32 appropriately justifies the proposed town centre zoning, and location of the town centre zone. A Local Centre zoning does not provide for the service, retail and employment needs of residents, nor maximises development opportunities consistent with Transit Oriented Development. The submission is considered to be seeking outcomes which result in the inefficient use of land and a scarce resource, and would result in outcomes inconsistent with the requirements of the National Policy Statement on Urban Development 2020. No amendments to reduce or further restrict activities in the zone are considered necessary.</p>
				Oppose	<p>The Submitter requests that the PPC proposes a road cross section for the form and function of State Highway 22. This is inappropriate</p>

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
			<p>assessments of how each proposed access/intersection fits with:</p> <ul style="list-style-type: none"> the current and future urban arterial form and function of State Highway 22 and; the bulk and location that would support a well-functioning urban arterial.
		34.7	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.
		34.8	Amend IX.2 Policy 5(a) to the Precinct provisions as follows: “Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct
		34.9	Amend IX.2 Policy 5(b) to the Precinct provisions as follows: “Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections. ”
35	Auckland Council	35.1	Decline the plan change in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region.
		35.2	Ensure that the council's concerns about bulk infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means: a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.
			as the PPC and works under the Precinct cannot dictate what NZTA/Waka Kotahi plan for the state highway.
			It is inappropriate to revise all documenting based on an “option” for a train station that is not “locked in”. The PPC includes commentary as to how the proposed Town Centre is suitably located for more than just one train station option.
			It is not considered appropriate to include reference to a rule in a Policy (as the objective and policy frameworks sets the direction for specific rule methods, not vice versa).
			The justification provided for this specific relief suggests that roading upgrades should not be predetermined at PPC stage and instead left for resource consent stage. This is not opposed – however the applicant is mindful that this relief may be problematic given other relief sought by other submitters seeking greater certainty on all required roading upgrades and infrastructure provision.
			The Submitter suggests that an infrastructure/development funding solution should be in place for the Precinct and “Sub-Region”. Funding for the “Sub-Region” and associated shortfalls is not a relevant matter for this plan change and it is not appropriate for this to fall on the Plan Change applicant to be responsible for. The PPC applicant is responsible for its share of the growth infrastructure for which the Council has available tools (such as development contributions, long terms plans etc) to recover contributions. This is important as the Council’s Future Land Supply Strategy identifies that Council must have Drury West development ready by 2022.

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
			<p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include:</p> <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing</p>
		35.3	<p>Include more policies and rules to give full effect to the direction the NPS-FM, including but not limited to Te mana o te wai.</p>
		35.4	<p>Amend Objective IX.2(5) to read: Include appropriate stormwater management and ecological enhancement measures when developing</p>
			<p>Implementation of the NPS-FM is set by Council's own AUP. The PPC text does not seek to amend or change any policy direction from the Council's Regional Plan on freshwater management issues specifically Chapter E1 and E3. The PPC does not propose to alter regional rules.</p>
			<p>KDL does not oppose the amendments but also does not consider that they are reasonably necessary either as the overarching policy direction for stormwater set by the existing Chapter E1 applies.</p>
			<p>Neutral</p>
			<p>Neutral</p>

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
			within the Precinct, to <u>avoid or otherwise mitigate</u> adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.
		35.5	<ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct.
		35.6	<p>Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read: (1) Activities <u>and subdivision</u> must comply with the Drury X Precinct Plan.</p>
		35.7	<p>Amend policy IX.3 (6)(b) to the Precinct provisions as follows: Incorporate <u>biodiversity</u> enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature</p>
		35.8	<p>Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.</p>
		35.9	<p>Add new policies to the Precinct provisions as follows: Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments. Require on-site management, or for higher density development private communal management of stormwater runoff from impervious areas.</p>
			Oppose / Support
			Reasons
			KDL is working with Healthy Waters to determine the most appropriate methods to implement the Stormwater Management Plan ("SMP").
			KDL does not oppose the amendments but also does not consider that they are reasonably necessary either as the Activity Table (A3) includes compliance with IX.6.1.
			KDL does not oppose the amendments but also does not consider that they are reasonably necessary.
			KDL is working with Healthy Waters to determine the most appropriate methods to implement the SMP.
			KDL is working with Healthy Waters to determine the most appropriate methods to implement the SMP.

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
			<p>Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</p> <p>Provide hydrology mitigation through retention, near source or communal detention to manage effects on streams.</p> <p>Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.</p> <p>Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects.</p>
		35.10	Add a new standard to provide for stormwater quality treatment
		35.11	Add a new standard to the Precinct provisions as follows: Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.
		35.12	Include indicative permanent and intermittent streams and wetlands on the precinct plan.
			<p>Oppose / Support</p>
			<p>Reasons</p>
		Oppose	This is unnecessary as quality treatment is addressed by existing AUP Chapter E9. There is no need to repeat these provisions in the Precinct.
		Oppose	This is unnecessary as quality treatment is addressed by existing AUP Chapter E9. Furthermore, provisions regarding materials were deleted by the Independent Hearing Panel in making recommendations on the proposed AUP, and that recommendation was accepted by the Council. There is no new evidence to suggest that the Council's decision in that regard should be reversed.
		Oppose	The identification (or lack thereof) of streams and/or wetlands on the Precinct Plan does not change the level of protection afforded to streams under the AUP or the National Environmental Standard for Freshwater 2020 ("NES Freshwater"), and having provisions which require riparian margins does not justify the need to identify where those are to be located at a PPC level.
			This is because the comprehensive suite of objectives, policies and methods including the NES Freshwater, and Regional rules contained in Chapters B7, E1 and E32 of the AUP will prevail at land use and subdivision resource consent stage. Furthermore, the AUP relies on the definitions for streams/rivers identified in Chapter

² Specifically, activities including, diversion, reclamation and/or structures in streams, rivers or wetlands are covered by those rules contained in Table E3.4.1.

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
		Oppose / Support	Reasons
			<p>J of the AUP. The objectives, policies and methods (including rules) do not rely on mapped stream features.</p> <p>On review of the AUP maps for the Auckland Region no stream or wetland locations are illustrated on the AUP planning maps. This indicates that the AUP methods do not rely on mapped streams or wetlands, but rather on the identification of resource consent triggers using the definitions and rules at the time of resource consent.</p> <p>Thus, the existing suite of objectives, policies and methods (including rules) will continue to apply to all waterbodies within the PPC area, irrespective of whether those are identified on the Precinct Plan or not. The Applicant has not proposed any changes to this comprehensive approach.</p> <p>There is no reason to include this. As above all streams are protected by virtue of the E3 provisions. Riparian planting is required for all streams on the site (not just those shown on the Precinct Plan). The blue-green corridors will occur as a result and do not need to be mapped.</p> <p>Appendix 15 includes information to be supplied with resource consents and are not standards which must be complied with.</p> <p>KDL does not oppose the amendments but also does not consider that they are reasonably necessary.</p> <p>It is inappropriate to identify local parks/open spaces which the Council has not yet purchased. Council has not approached KDL regarding the acquisition of this land, and the process of acquiring that land is through the Local Government Act 2002.</p> <p>Refer to further submissions reasons listed elsewhere for Auckland Council.</p>
35.13		Oppose	
35.14		Oppose	
35.15		Neutral	
35.16		Oppose	
35.17		Oppose in part	

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
		35.18	Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone. Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission. Other supporting technical documents may need to be updated to include this change.
		35.19	Add a policy and standard to provide for increased density near RTN stations including: a. Adding a policy to the effect of: Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station. b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station. c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone; d. Any alterations to other building standards to respond to increased building height. e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.
		35.20	Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.
			Oppose
			The submission seeks to expand the PPC beyond that proposed by the PPC. The Council does not have scope or any legal basis on which to seek this change.
			Support in Part, Oppose in Part
			Increased densities near RTN stations are generally supported, however it is unclear if the relief sought can be implemented as it may be subject to reasons for further submissions reasons listed elsewhere for Auckland Council. The PPC utilises Council's existing Town Centre and THAB Zones, which already address development opportunities associated with land use and transport integration.
			Neutral
			KDL does not oppose the amendments but also does not consider that they are reasonably necessary as the frontages are clearly tied to the roads (regardless of if these move or not).

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
		35.21	<p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <ol style="list-style-type: none"> 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed; 2. The impacts of the gas transmission line on the proposed network and associated development patterns; 3. The identification of a local network design that can practically accommodate the gas transmission line; and 4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.
		35.22	<p>Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.</p>
		35.23	<p>Provide a notable tree assessment and scheduling of any notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.</p>
			<p>Oppose / Support</p> <p>Oppose</p>
			<p>Reasons</p> <p>PPC51 and the Drury 2 Precinct does not override or alter the Infrastructure provisions in Chapter 26 of the AUP. These contain an enabling activity status for network utilities. There is no need to repeat these in the PPC.</p> <p>The Council needs to explain why this provision is sought for a 33ha PPC area while the same provision does not exist throughout the remainder of the region, or is already addressed through provisions such as that associated with E12 of the AUP regarding earthworks.</p> <p>First Gas as a network utility operator has the ability under section 176 of the RMA to lodge a Notice of Requirement for its assets to ensure the ongoing protection and approvals which are trying to be sought through this PPC process. The pipeline is already legally protected via easements registered on the affected titles.</p> <p>Furthermore, the Drury 2 Precinct is an extension to the existing Drury 1 Precinct. KDL notes that the first gas pipeline runs through the Drury 1 Precinct which has now been subject to two plan change processes and deemed appropriate without the provisions being requested. In addition the same pipeline continues further north through the southern portion of Hingaia which is live zoned (via plan variations to the AUP) without the provisions being requested.</p> <p>For these reasons KDL does not see any resource management issue for which there is a need to incorporate the changes requested.</p> <p>Mana Whenua values and incorporation of mana whenua input and feedback can be addressed through the ongoing consultation between KDL and Mana Whenua.</p> <p>The submission is vague, not based on any specific relief and is unnecessary considering the approach of the AUP to these values on a region-wide basis.</p>

ORIGINAL SUBMISSION		FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	
		35.24	Enable and provide for accessible and affordable social housing for Māori.	
36.	NZTA	36.1	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury -Opaheke Structure Plan.	
		36.2	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.	
		36.3	Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).	
		36.4	That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form and function of State Highway 22.	
		36.5	Replace all references within this precinct description from "Town Centre" to 'Local Centre'.	
		36.6	Add a new Objective to the Precinct provisions as follows: Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.	
		36.7	Retain other IX.2 objectives.	
		36.8	Insert new Policies to the Precinct provisions as follows;	
			Oppose / Support	Reasons
		Oppose	The Council's Structure Plan, PPC and Section 32 appropriately justifies the proposed town centre zoning, and location of the town centre zone. A Local Centre zoning does not provide for the service, retail and employment needs of residents, nor maximises development opportunities consistent with Transit Oriented Development. The submission is considered to be seeking outcomes which result in the inefficient use of land and a scarce resource, and would result in outcomes inconsistent with the requirements of the National Policy Statement on Urban Development. No amendments to reduce or further restrict activities in the zone are considered necessary. It is inappropriate to revise all documenting based on an "option" for a train station that is not "locked in". The PPC includes commentary as to how the proposed Town Centre is suitable located for more than just one option.	
		Oppose	This matter is already addressed by the provisions in Chapters E25 and E26 of the AUP, no further objectives or policies are needed.	
		Support in part Oppose in part	The retention of the objectives as drafted/notified is supported, however, the submitter has sought other changes which are not supported.	
		Oppose	This matter is already addressed by the provisions in Chapters E25 and E26 of the AUP, no further objectives or policies are needed.	

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
			<p>Policy X Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network.</p> <p>Policy XX Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls.</p>
		36.9	Amend IX.3 Policy 2 to the Precinct provisions as follows: (2)(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.
		36.10	Retain IX.3 Policies 3 & 4 to the Precinct provisions.
		36.11	Retain IX.3 Policy 5 to the Precinct provisions.
		36.12	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules.
		36.13	Add a new Activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.
		36.14	Add a new rule to IX.6.2 Transport Infrastructure Requirements to the Precinct provisions as follows: State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure.
		36.15	Retain IX.6.4 Site Access.
		36.16	Insert activity controls as per attachment 1 to the submission.
			<p>Oppose / Support</p> <p>Reasons</p>
			<p>This matter is adequately addressed through the region-wide approach of the AUP, and it is inappropriate for NZTA to be basically seeking a spot-zone of rules which apply to this PPC area and nowhere else in the region.</p> <p>This matter relates to the zoning proposal which is addressed under point 36.1 above.</p> <p>The retention of the objectives as drafted/notified is supported, however, the submitter has sought other changes which are not supported.</p> <p>This matter relates to the zoning proposal which is addressed under point 36.1 above.</p> <p>The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.</p> <p>This supports the retention of the rule as drafted/notified.</p> <p>The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to</p>
			<p>Oppose</p> <p>Support</p> <p>Oppose</p> <p>Support</p> <p>Oppose</p> <p>Support</p> <p>Oppose</p>

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
		36.17	Insert matter of discretion and assessment criteria as per attachment 1 below to the submission.		provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.
39	Auckland Transport	39.1	Decline plan change unless submitter's concerns are addressed including about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed.	Oppose	The development is not 'out of sequence' as referenced by the submitter. The Council's Future Urban Land Supply Strategy identifies this area as being "development ready" by 2022. KDL is concerned that this has mistakenly been labelled as "out of sequence" and that this has misled the submitter to make incorrect submissions regarding shortages in funding. Auckland Transport's submission is not consistent with the Council's policy position on this matter, and the Council's Structure Plan.
		39.2	Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.	Oppose	The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.
		39.3	Auckland Transport supports the proposed centre zoning and residential zoning mix provided that the proposed network can accommodate this	Support	As this supports the PPC zoning extents as notified.
		39.4	Amend the plan change to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road: <ul style="list-style-type: none"> • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements • Funding and delivery of the above work. 	Oppose	The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.
		39.5	Amend the plan change to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to:		

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
			<ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new train station; • Any interim improvements to Karaka Road; • Introduction of passenger transport services to the Precinct Plan area • Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. • Any other transport improvements identified as being required to support proposed development. 		
		39.6	Amend the plan change to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria.		
		39.7	<p>Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to:</p> <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways Public Transport (dedicated lanes, geometry etc) • Ancillary Zone (Parking, Public Transport stops, street trees) • Berm • Frontage • Building Setback • Design Speed. 	Oppose	The requested provisions are not needed within the PPC. Roads are designed and vested associated with the provisions of Chapter E38 of the AUP. The design of roads is also subject to Auckland Transport's Code of Practice.

ORIGINAL SUBMISSION		FURTHER SUBMISSION	
No.	Submitter name(s)	Point	Relief/Decision sought
		39.8	Amend the plan change to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.
		39.9	Amend the plan change to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes.
		39.10	Replace the references to cycle and 3m shared paths with a reference to "separated cycle paths on both sides". Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions
		39.11	a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is capable of accommodating buses.
		39.12	a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road.
			Oppose / Support
			Reasons
			The requested provisions are not needed within the PPC. Road cross sections and design are best addressed at subdivision design stages.
			The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.
			The standard is intended to apply to 3m shared paths and has been used elsewhere in Auranga/Drury 1.
			The provisions and Precinct Plan layout as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
			<p>b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise.</p> <p>c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process.</p>		
		39.13	Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.		
		39.14	Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others".		
		39.15	Amend the Precinct Plan and zoning as required to address the issue raised.		
		39.16	<p>The following assessment is sought along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.</p> <p>a) Why the approach adopted for the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed.</p> <p>b) The impacts of the gas transmission line on the proposed network and associated development patterns.</p> <p>c) The identification of a local road and reserve network design that can practically accommodate the gas transmission line.</p>	Oppose	<p>The Drury 2 Precinct is an extension to the existing Drury 1 Precinct. KDL notes that the first gas pipeline runs through the Drury 1 Precinct which has now been subject to two plan change processes and deemed appropriate without the provisions being requested. In addition the same pipeline continues further north though the southern portion of Hingata which is live zoned (via plan variations to the AUP) without the provisions being requested.</p> <p>For these reasons KDL does not see any resource management issue for which there is a need to incorporate the changes requested.</p>
		39.17	Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation.	Oppose	The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
		39.18	That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.		development of the PPC area. No further methods are considered necessary.
		39.19	Make necessary amendments to the plan change as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.		
		39.20	Add a new Policy to the Precinct provisions as follows: Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants	Oppose	This matter is already addressed by the provisions in Chapter E25 and E26 of the AUP, no further objectives or policies are needed. This matter is adequately addressed through the region-wide approach of the AUP, and it is inappropriate for Auckland Transport to be basically seeking a spot-zone of rules which apply to this PPC area and nowhere else in the region.
		39.21	Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: (X) Development that does not comply with IX.6.X Noise Mitigation.		
		39.22	Add a new assessment criterion to the Precinct provision as follows: The extent to which noise sensitive activities in proximity to arterial roads are managed.		
40	Ministry of Education	40.1	Amend Policy IX.3 (2) to the Precinct provision as follows: Incorporate the following elements of the Precinct Plan in the design of any subdivision and development: (a) The pattern, hierarchy and function of roads, including the town centre's main street and links to	Support in part	KDL supports the intent of the MoE relief sought and acknowledges the continued consultation between the parties to achieve suitable outcomes.

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
			<p>the State Highway network, and future rail station and schools;</p> <p>(b) Public open spaces and Pedestrian and cycle linkages to public open spaces and schools;</p> <p>(c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct;</p> <p>(d) Key intersections;</p> <p>(e) The amenity feature of the lake associated with the Town Centre;</p> <p>(f) Open space areas; and</p> <p>(g) Key retail and commercial frontages.</p>		
		40.2	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.		
		40.3	Retain Standard IX.6.2 Staging of Development with Transport Upgrades.		
		40.4	Retain Standard IX.6.4 Site Access.		
		40.5	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities		
		40.6	Confirm ongoing engagement with Auckland Council and Karaka and Drury Ltd with housing typologies, staging and timing for the project.		
41	Heritage New Zealand Pouhere Taonga	41.1	Include provisions within the precinct plan to require archaeological assessment of the area are undertaken by a suitably qualified professional including an evaluation, by a suitably qualified heritage consultant of the wider heritage landscape through the resource consenting process.	Oppose	The existing AUP provisions adequately address archaeological matters and there is no resource management reason for this Precinct to have different methods to the remainder of the Region.
		41.2	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents, as assessed by a professionally qualified archaeologist.		

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
		41.3	Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified.		
		41.4	Explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four jointly notified plan changes.		
42	Drury South Limited	42.1	Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades: (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection. (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.	Oppose	The provisions as notified have been based on technical reporting undertaken to inform the plan change and which are required to provide an level of appropriate infrastructure to service development of the PPC area. No further methods are considered necessary.
43	Kāinga Ora	43.1	Approve the plan change, subject to: • The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; • The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and • The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone.	Oppose	KDL opposes any extension to the Plan Change boundary as notified.
		43.2	Approve the plan change, subject to: • the inclusion and application of a 19.5m Height Variation Control in the proposed zoning area; • retaining the spatial extent of the precinct boundaries		
		43.3	Amend Objective 3 to the Precinct provisions as follows: <i>“Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian <u>multi-modal linkages</u> through and</i>	Neutral	KDL does not oppose the amendments but also does not consider that they are reasonably necessary.

ORIGINAL SUBMISSION			FURTHER SUBMISSION		
No.	Submitter name(s)	Point	Relief/Decision sought	Oppose / Support	Reasons
			<i>between the Precinct, adjoining Precincts and to future planned public transport facilities."</i>		
		43.4	Amend Policy 4(h) to the Precinct provisions as follows: "Be designed according to <u>incorporate</u> perimeter block principles where car parking is provided behind buildings except for kerbside parking.		
		43.5	Amend Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with and not precede required infrastructure provision, including transport upgrades within Standard IX.6.2 necessary to support development within the precinct;"		
		43.6	Retain Policy 5(b) to the Precinct provisions subject to the following amendment: "Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections."	Oppose	KDL considers that the provisions as drafted as notified are sufficient.
		43.7	Retain IX.6.2 (1) Transport infrastructure Requirements provision to the Precinct provisions subject to clarification and/or amendment sought. that the phrase "...OR must not precede the upgrades outlined in Table IX.6.2.1" be deleted.		
		43.8	Amended the IX.6.3 (2) Riparian Planting provision to the Precinct provisions as follows: "(2) The riparian planting plan (to give effect to compliance with Standard IX.6-3(4)) Any development or subdivision of land that <u>contains a stream must:</u>		

Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council
FURTHER SUBMISSION ON: Plan Change 51 (Private): Drury 2 Precinct
FROM: Watercare Services Limited
ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz
DATE: 29 January 2021

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

1. INTRODUCTION

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

Watercare made an original submission on Proposed Plan Change 51: Drury 2 Precinct, submission no. 32. Defined terms in Watercare's original submission have been used in this further submission.


2. FURTHER SUBMISSION

Watercare wishes to make a further submission on the Plan Change. These further submissions are included in the attached table.

3. HEARING

Watercare wishes to be heard in support of its submission.

29 January 2021



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for Service:
Ilze Gotelli
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141
Phone: 021 831 470
Email: ilze.gotelli@water.co.nz

Submitter ID	Submission point #	Submitter name	Submission point	Support/oppose	Watercare further submission commentary/relief sought
2	2.1	Yu Wang	Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
3	3.1	Fire and Emergency New Zealand	Add new policy to the Precinct provisions as follows: <ul style="list-style-type: none"> Policy xx: <u>Ensure that development in Drury Centre is coordinated with supporting stormwater, wastewater and water supply infrastructure.</u> 	Support	Watercare supports this submission point as it aligns with the amendments to Policy 5 sought in Watercare's original submission.
4	4.1	God Save the Flag	Approve the plan change conditional on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside PC48 area).	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
6	6.1	Britmat Holdings Ltd	Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business – Local Centre Zone to match that of the land adjoining at 200 – 212 Great South Road.	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
35	35.2(c)	Auckland Council	The Council is concerned to ensure that infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions.	Support	Watercare supports this submission point as it aligns in part with the amendments to Policy 5 sought in Watercare's original submission.
43	43.1	Kāinga Ora	Approve the plan change, subject to: <ul style="list-style-type: none"> the zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; the zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and the zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone. 	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
43	43.2	Kāinga Ora	Approve the plan change, subject to: <ul style="list-style-type: none"> The inclusion and application of a 19.5m Height Variation Control in the proposed THAB zone area. 	Oppose	Watercare is opposed to any increase in the development yield from that set out in the Plan Change application that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.

APPENDIX 8
RECOMMENDED CHANGES

Appendix 8 – Recommended Changes to Precinct Provisions

Note: **Green** highlight indicates text that would need to be changed or deleted to reflect an alternative zoning layout that did not include a Business: Town Centre zone. Specific wording cannot be recommended in the absence of an alternative proposal.

Amendments are shown with text to be deleted as ~~struck through~~ and text to be added as underlined.

IX Drury 2 Precinct

IX.1. Precinct description

The precinct has an area of 33.65 ha and is bordered by the Drury 1 Precinct to the North, the Ngakaroa Stream to the east, SH22 (Karaka Road) to the south and land fronting Jesmond Road to the west. The site is gently rolling terrain with a number of small tributary streams of the Ngakaroa Stream and Drury Creek.

The precinct provides for a town centre within Drury West. This supports the growing resident and worker population of this area.

The realignment of Burberry Road, along with an intersection of this road, SH22 and McPherson Road provides for an interconnected roading network from the Drury 1 Precinct, **through the town centre to SH22. It also provides multi-modal transport links between future public transport opportunities, the Drury South industry park and the Drury 1 Precinct to the north.**

Refer to planning maps for the location and extent of the precinct. The following underlying zones apply to the precinct:

- Residential - Mixed Housing Urban
- Residential - Terrace Housing and Apartment Buildings
- **Business - Town Centre**

The relevant overlays, Auckland-wide and zone provisions apply in this precinct unless otherwise specified in this precinct.

IX.2. Objectives

- (1) Provide a Town Centre within the Precinct, which:**
 - (a) Achieves high-quality urban design outcomes;**
 - (b) Services the needs of the existing and planned Drury West area; and,**
 - (c) Is supported by high-density residential development.**

(2) Develop the Precinct for urban activities in a comprehensive and integrated way, which recognises the importance of the Town Centre as a focal point for Drury West.

(3) Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides ~~pedestrian~~ multi-modal linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities.

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

(5) Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to avoid or otherwise mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.

The overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

IX.3 Policies

Development

- (1) Enable and design the Town Centre so that it:
- (a) Incorporates a range of uses, such as retail, commercial, leisure, cultural, community and civic activities;
 - (b) Connects to a range of transport modes including, existing, planned and future public transport, vehicle, pedestrian and cycle networks;
 - (b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity; and
 - (c) Contains buildings with high-quality urban design and which are of variable height.
- (2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:
- (a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network and future rail station;
 - (b) ~~Public open spaces and pedestrian and cycle~~ Active transport linkages (outside of riparian margins);
 - (c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct;
 - (d) Key intersections;
 - (e) The amenity feature of the lake associated with the Town Centre;
 - (f) Open space areas; and
 - (g) Key retail and commercial frontages.
 - (h) Indicative streams.

Built Form

(3) Control development so its scale and design contributes to the creation of high-quality intensive urban amenity through building heights as shown on the height variation control maps, pedestrian connections and public open space, particularly where associated with the Town Centre.

[Rewording should refer to the interface of development with the lake and SH22, and the retention and integration of existing well-established vegetation where possible]

- (4) Require buildings with frontages to key retail and commercial streets to:
- (a) Avoid blank walls;
 - (b) Provide easily accessible pedestrian entrances;
 - (c) Provide minimum floor heights to maximise building adaptability to a range of uses;
 - (d) Maximise outlook through glazing onto streets and public places;
 - (e) Have frontages of sufficient height to frame the street;
 - (f) Provide weather protection for pedestrians along road frontages;
 - (g) Locate vehicle crossings to provide for safe pedestrian, cycle and vehicular movements; and
 - (h) Be designed according to perimeter block principles where car parking is provided behind buildings except for kerbside parking.

(4a) Acknowledge and incorporate Mana Whenua values in development by:

- (a) Retaining and enhancing streams and their margins;
- (b) The physical design of streets, open spaces and plazas incorporating Te Aranga Design principles; and
- (c) Encouraging applicants to seek input of Mana Whenua into the design of key buildings.

Infrastructure

(5) Require subdivision and development to:

- (a) Be sequenced so as to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades necessary to support development within the precinct;
- (b) Implement the transport network connections and elements as shown on the Precinct Plan; ~~including by providing new roads and upgrades of existing roads and intersections;~~
- (c) Be managed so that it does not adversely affect the safe and efficient operation of the existing and planned transport network; and
- (d) Promote and develop connections to the future planned public transport facilities and social infrastructure such as open space and schools.

Stormwater Management

- (6) Require subdivision and development to:
 - (a) Be consistent with any approved network discharge consent and supporting stormwater management plan adopted by Council under that discharge consent including the application of water sensitive design to achieve water quality and hydrology mitigation; ~~and~~
 - (b) achieve stormwater quality treatment of stormwater runoff through use of inert building materials; and
 - ~~(b c)~~ Incorporate biodiversity enhancement planting of riparian margins of streams (including the Ngakoroa Stream), wetlands and the lake feature.

Noise Mitigation

- (7) Ensure that new activities sensitive to noise adjacent to State Highway 22 are located, designed and constructed to mitigate adverse effects of road noise on occupants.

The overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

IX.4. Precinct rules

The activity tables in any relevant overlays, Auckland-wide and zones apply unless the activity is listed in Table IX.4.1 Activity table below.

Table IX.4.1 specifies the activity status of land use and subdivision activities in the Drury 2 Precinct pursuant to sections 9(3) and section 11 of the Resource Management Act 1991.

Note: A blank cell in the activity status means the activity status of the activity in the relevant overlays, Auckland-wide or zones applies for that activity.

Table IX.4.1 Land use and subdivision activities in Drury 2 Precinct

Activity		Activity status
Subdivision		
(A1)	Subdivision listed in Chapter E38 Subdivision – Urban	
(A2)	Subdivision that does not comply with Standard IX.6.2 Transport infrastructure requirements	NC
(A3)	Subdivision that does not comply with any of the standards listed in IX.6.1 and IX.6.3-IX.6.4	D
Use and development		
(A4)	Activities listed as permitted, restricted discretionary, discretionary or non-complying activities in Table H6.4.1 Activity table in the Residential – Terrace Housing and Apartment Buildings Zone	
(A5)	Activities listed as permitted, restricted discretionary, discretionary or non-complying activities in Table H10.4.1 in the Business – Town Centre Zone	

(A6)	Activities that do not comply with Standard IX.6.2 Transport infrastructure requirements	NC
(A7)	Activities that do not comply with any of the standards listed in IX.6.1 and IX.6.3-IX.6.4	D

IX.5. Notification

(1) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(2) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the council will give specific consideration to those persons listed in Rule C1.13(4).

IX.6. Standards

The standards in the overlays, Auckland-wide and zones apply to all activities listed in Table IX.4.1 Activity table in this precinct, in addition to the standards listed in IX.6.1-IX.6.4-6 [or 7] below.

IX.6.1 Compliance with the Drury X₂ Precinct Plan

(1) Activities and subdivision must comply with the Drury X₂ Precinct Plan.

IX.6.2 Transport Infrastructure Requirements

(1) All subdivision and development (~~including construction of any new road~~) ~~must be undertaken concurrent with the following planned and funded infrastructure OR must not precede~~ comply with the upgrades outlined in Table IX.6.2.1.

Table IX.6.2.1 Transport Infrastructure Requirements

Transport Upgrade Required	Trigger
<i>The intersection of SH22 and Jesmond Road must be upgraded with a double lane roundabout with approach lanes, or traffic signals (including approach lanes) where the posted speed limit supports their implementation to provide a safety and capacity solution, unless an interim traffic safety solution has been approved by the New Zealand Transport Agency as the requiring authority for State Highway 22.</i>	<i>Any new lot; <u>including construction of any new road</u>; or prior to the occupation of any new <u>building dwelling or town-centre activity</u> in the Precinct Plan area.</i>
<i><u>SH22 must be upgraded to an urban standard with four lanes and provision for pedestrian and cycling facilities between Jesmond Road and SH1 Drury Interchange</u></i>	<i><u>Prior to the occupation of any new building in the Precinct Plan area.</u></i>
<i><u>The intersection of SH22 and Burberry Road must be relocated in general accordance with the Drury 2 precinct plan, and the existing intersection of SH22 and Burberry Road must be closed</u></i>	<i><u>Prior to the occupation of any new building in the Precinct Plan area.</u></i>

[**Depending upon the updated ITA and final zoning pattern, additional triggers may need to be added to Standard IX.6.2.1 e.g. in relation to the Drury West and/or Central train station, Jesmond Road FTN and Bremner Road FTN being operational, and provision of active transport linkages from the PPC51 area to this public transport infrastructure.]

IX.6.3 Riparian Planting

(1) The riparian margins of any wetland, permanent or intermittent stream ~~and~~ (including the Ngakoroa Stream) must be planted to a minimum width of 10m measured from the top of the stream bank, except where road or pedestrian crossings are required over streams. The riparian margins of the lake feature must be planted to an average width of 20m.

~~(2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) must:~~

~~(a) include a plan identifying the location, species, planting bag size and density of the plants;~~

~~(b) use eco-sourced native vegetation where available;~~

~~(c) be consistent with local biodiversity;~~

~~(d) be planted at a density of 10,000 plants per hectare, unless a different density has been approved on the basis of plant requirements.~~

IX.6.4 Site Access

(1) Where subdivision adjoins a road with a 3m shared footpath or protected cycle lane on the site's frontage, rear lanes (access lot) or access from side roads must be provided so that no vehicle access occurs directly from the site's frontage to the 3m shared footpath or the road frontage.

IX.6.5 Building materials

(1) New buildings and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that do not have an exposed surface made from contaminants of concern to water quality (i.e. zinc, copper, and lead).

IX.6.6 Noise mitigation

(1) Any new buildings or alterations to existing buildings containing an activity sensitive to noise closer than 40m to the boundary of State Highway 22 must be designed to achieve the noise standards in E25.6.10.

IX.6.7 Yards

(1) A building or parts of a building must be set back by a minimum depth of 20m from the bank of the Ngākoroa Stream.

[IX.6.8 Possible standard for interface with SH22, depending upon final zoning pattern]

IX.7. Assessment – controlled activities

There are no controlled activities in this precinct.

IX.8. Assessment – restricted discretionary activities

IX.8.1 Matters of discretion

The council will restrict its discretion to all the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlay, Auckland-wide and zone provisions.

(1) All activities:

(a) Consistency with the objectives and policies of the Drury 2 Precinct

(b) The retention and integration of existing vegetation

(2) Subdivision and development adjoining the lake

(a) The quality of the interface created to the lake amenity feature

(3) Subdivision that provides the east west collector road shown on Precinct Plan 1

(a) Onward connections through adjoining land

(4) Infringements of Standard IX.6.5 Building materials

(a) Stormwater quality

(5) Infringements of Standard IX.6.6 Noise mitigation

(a) The effects of the non-compliance on the health and amenity of occupants

[(6) Possible SH22 interface matters of discretion depending on final zoning pattern]

IX.8.2 Assessment Criteria

The council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlay, Auckland-wide and zone provisions.

(1) All activities:

(a) The extent to which the proposal is consistent with the objectives and policies of the Drury 2 Precinct or achieves the equivalent or better outcome.

(b) Whether existing well-established vegetation, particularly the mixed exotic plantings to the east of the lake feature, is retained and integrated into subdivision and development where possible.

(2) Subdivision and development adjoining the lake

(a) Whether the subdivision layout and/or development design creates a high quality interface with the lake and provides for visual connections to and physical connections to and around the lake.

(3) Subdivision that provides the east west collector road shown on Precinct Plan 1

(a) Whether information is provided that demonstrates the feasibility of the road continuing to Jesmond Road through neighbouring land.

(4) Infringements of Standard IX.6.5 Building materials

(a) The extent to which development:

(i) is in accordance with the approved Stormwater Management Plan and Policies E1.3(1) – (10) and (12) – (14).

(ii) implements a treatment train approach to treat runoff from all impervious surfaces so that all contaminant generating surfaces are treated including cumulative effects of lower contaminant generating surfaces.

(5) Infringements of Standard IX.6.6 Noise mitigation

(a) Whether alternative mitigation is provided which manages the effects of the non-compliance on the health and amenity of occupants.

[(6) Possible SH22 interface assessment criteria depending on final zoning pattern]

IX.9 SPECIAL INFORMATION REQUIREMENTS

(1) Any works associated with the lake feature (including subdivision which seeks to vest the lake as a public asset) shall provide as a minimum the following information relating to the stability of the lake:

(a) Cross sections through the highest point in the fill embankment.

(b) Estimate of the volume of water retained (current and/or proposed if this is to change as a result of the works)

(c) Geotechnical comment on the integrity of the structure.

(2) Prior to the first subdivision application, in relation to the risk assessment required by Policy E36.3.32, a high-level (scoping) geotechnical assessment of lateral spread risks shall be completed that identifies the nature and magnitude for these constraints and implications for development.

(3) Any new road access to SH22 shall be supported by a Transport Assessment Report and Road Safety Audit, prepared by a suitably qualified transport engineer in consultation with Waka Kotahi NZ Transport Agency, confirming that the location and design of the intersection supports the safe and efficient function of the transport network.

(4) Any subdivision application shall include an environmental management plan containing:

(a) ecological surveys of bats and birds

(b) the identification of any existing significant ecological values and habitat features to be protected from development

(c) stream surveys which determine the location and classification of any stream on the site

(d) an assessment of notable trees confirming any trees to be nominated to Council to be scheduled and to be protected from development.

(5) Any development or subdivision of land that contains a stream or adjoins the Ngākoroa Stream shall be accompanied by a riparian planting plan that is prepared by a suitably qualified and experienced person and:

(a) demonstrates compliance with Standard IX.6.3(1) and incorporates all information requirements of Appendix 16;

(b) identifies the location, species, planting bag size and density of the plants;

(c) uses eco-sourced native vegetation where available;

(d) provides fruiting and flowering plants for birds and suitable habitat structure for lizards;

(e) has a planting density of 10,000 plants per hectare, unless a different density has been approved on the basis of plant requirements.

(f) includes an archaeological assessment prepared by a suitably qualified and experienced archaeologist showing the location and extent of any archaeological sites to be avoided.

IX.10 PRECINCT PLAN

The following changes are recommended:

- REPLACE ZONING WITH SMALLER BUSINESS: LOCAL CENTRE ZONE AND SUPPORTING THAB AND MHU ZONES OR THAB AND MHU ZONES ONLY; REVISE OTHER ELEMENTS E.G. ROAD NETWORK TO SUIT
- Add indicative streams and wetlands with a notation that they are indicative in location and classification and may not be exhaustive, and are to be confirmed via further investigations at development stage.
- [Add indicative open space in location from Auckland Council submission (should BTC zone be accepted)].
- Esplanade reserve to be labelled as 'indicative'.
- Add active transport provision notation for Ngākoroa Stream esplanade reserve.
- Add existing amenity vegetation east of the lake
- North south local road to be entirely within the precinct.
- 'by others' deleted for intersection upgrades.
- Form of intersection (signals) deleted.
- 3m shared path be replaced by 'provisions for active transport'.
- Passenger transport provision to be notated for the town centre local road (if kept) to the west and any collector road.
- Inclusion of end of Burberry Road inside precinct boundary.
- Show gas transmission pipeline and easement location.

A rough markup of the precinct plan, excluding any zoning and road network changes, is included below.

ZONING AND OVERLAYS

- REPLACE ZONING WITH SMALLER BUSINESS: LOCAL CENTRE ZONE AND SUPPORTING THAB AND MHU ZONES OR THAB AND MHU ZONES ONLY
- Remove 27m Height Variation Control

