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The Minister for the Environment
c/o The Environment Protection Authority
Private Bag 63002
Waterloo Quay Wellington 6140

18 May 2021

Dear Minister Parker,

We are responding to your invitation for comments on three applications before you for referral to the Expert Panel under the COVID-19 Response (Fast Track Consenting) Act 2020.

The applications are made by Kiwi Property Holdings No 2 Limited, Fulton Hogan Land Development Limited and Oyster Capital Limited, and are located at various addresses in Drury, Auckland as detailed in the applications.

Having reviewed the application material provided, Auckland Council strongly opposes the proposals being decided through the Fast Track process.

I summarise the key points below, in response to the specific questions in your letter:

- 1. Are there any reasons that you consider it more appropriate for the projects, or part of the projects, to continue to proceed through existing Resource Management Act 1991 (RMA) private plan change processes rather than the processes in the FTCA?**

Process matters

Private Plan Changes 48, 49 and 50 relating to these areas of land are well advanced, with hearings scheduled to commence on 28th July 2021. This process is the appropriate means for scheduling integrated development of large new urban areas. Consenting parts of these plan change areas before the plan changes are decided is not sound planning practice. A plan change process is more likely to achieve efficient use of the land and resolve relationships between uses, through detailed zoning, precinct plans and standards. Given the timing of the Plan Changes, there will be no timing efficiencies created if these proposals were to go through the Fast Track process.

From a construction timing point of view the applications are reliant on wider infrastructure upgrades which are not likely to occur any faster, even if consent is granted to these projects.

From a funding point of view there remains a major funding gap for the infrastructure, which may be in the range of \$400 - \$600 million or more, and these proposals do not resolve that fact. Much of this funding burden would fall on Council which has not budgeted for this nor is it able to raise the necessary capital.

Referral of these projects to the Fast Track consenting process is likely to have a precedent effect and result in similar applications for development of Future Urban Zone land prior to completion of plan change processes, recognising that the proposals being considered are more akin to the scale and size of a plan change, not a resource consent.

The Fast Track process, once initiated has strict timeframes, and no ability to place applications on hold. Given the scale of these proposals, and the integration required with the wider Drury area, the amount of effort required for the consenting process would be

considerable and could lead to undesirable outcomes (appreciating applications can be declined).

Urban design outcomes

The projects may result in under-development of the scarce land resource. The proposed residential development densities in the projects appear less than could be achieved under the proposed (structure plan and private plan change) zonings. This may trade off development in the near term (constrained by the current infrastructure constraints) against the full achievable development potential.

The urban interface of the application sites with the adjacent properties within the Plan Change areas is not well resolved in the proposals.

Infrastructure design, construction sequencing and funding

All three plan changes, and consequently the Fast Track Applications, are currently out of sequence with regards to the Future Urban Land Supply Strategy (FULSS), and the intended delivery of strategic and significant infrastructure, in particular transport infrastructure.

Partial or non-delivery of infrastructure can lead to fragmented and undesired urban outcomes. These may include unsafe transport networks, particularly for walking and cycling, and favouring private vehicle use which can be difficult to reverse in the future once the infrastructure is completed.

The sequencing of infrastructure is also important given the desire to implement and future proof appropriate capacity. For example, retro fitting new roads and pipes is an undesirable outcome which may occur if the wider area is not planned and costed appropriately.

Design of assets prior to vesting in Council

Assets to be accepted by Council bodies need to be fully fit for purpose. This includes meeting design standards, meeting policy on the types of assets are required where, maintenance and life cycle costs and consideration of environmental effects. There is a risk that vested assets Council may inherit through a Fast Track process are not to the same standard or consistent with those assets which go through the normal plan change, resource consent and engineering plan approval process, resulting in a financial burden not anticipated.

2. How do these projects align with the Auckland Unitary Plan and the Drury- Opāheke Structure Plan?

At a broad level, the projects are not consistent with the Drury-Opāheke Structure Plan. Please refer to the attached Planning comment for further discussion of this. Some of these inconsistencies relate to the timing of delivery of structure plan components.

The projects do not fully deliver on objectives and policies of the RPS and the AUP Transport chapter relating to promotion of public transport and walking / cycling and for sequencing the delivery of infrastructure at the same time as development. In terms of other AUP objectives and policies the proposals could, subject to further detail, be able to comply in many respects e.g. earthworks, streamworks, contamination.

3. How do these projects align with the National Policy Statement for Urban Development and the National Policy Statement for Freshwater Management?

The NPS-UD seeks to achieve well-functioning environments that achieve housing choice, are supported by public transport, enable a variety of sites suitable for different business sectors, and support reductions in greenhouse gas emissions. The NPS-UD also seeks that local

authority decisions are integrated with infrastructure planning and funding decisions. The referral areas are not supported by existing public transport and are likely to be difficult to service with new public transport. This will likely lead to travel patterns that generate more greenhouse gas emissions compared with development integrated with public transport infrastructure. Therefore, the referrals are unlikely to achieve a well-functioning urban environment.

In terms of the NPS Freshwater the information to date on the proposals is limited. Given the size of the sites and the early designs it seems likely that the projects could comply, subject to further design details.

4. Private Plan Changes 48, 49 and 50 relate to these projects. How to the concerns raised in your submissions to these plan changes relate to these projects?

Please see the comments in the Planning Specialist Response attached. Council is supportive overall of the future development of these areas, the issues in question are the timing of this development and how it integrates with infrastructure planning and the planned future release of urban land.

5. What reports and assessments would normally be required by the Council for a project of this nature in this area?

As these are large scale integrated subdivision and land use applications a full set of application reports would be required, including but not limited to:

- Overall Assessment of Environmental Effects.
- Subdivision application plans. These should include all intended easements in favour of Council or land intended to vest to Council.
- Dwelling design plans, where these are proposed.
- Preliminary Site Investigation (PSI) report to assess activities with respect to the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011. A Detailed Site Investigation (DSI) report may then be required together with a Remedial Action Plan (RAP).
- Integrated Transport Assessment addressing the effects of the sites combined as well as individually.
- Infrastructure report and plans, including:
 - Calculation of the expected water demand from the proposal
 - Calculation of the expected wastewater flows
 - The overall water supply and wastewater scheme to service the site
 - Public stormwater network and devices including calculations and design plans
- Intended timing of delivery and funding of all major / shared infrastructure upgrades.
- Flooding and hydrology design reports and Stormwater Management Plan.
 - Copies of the hydrologic and hydraulic models that the applicant has undertaken, to confirm modelling assumptions
 - Confirm whether attenuation of flows is required (temporary or permanent) and that the effects of development on flood flows and the floodplain can be managed on site.
 - Identification of wetlands in accordance with NES FW guidelines and any statement on how this effects stormwater management across the development site.
 - Groundwater and infiltration testing across the plan change areas to determine if detention to meet SMAF 1 requirements can be met.
 - Demonstration that hydrology mitigation is provided to AUP SMAF 1 control guidelines (to keep consistent with the catchment wide requirements outlined in Structure Plan SMPs). The results should reflect the location of natural wetlands and streams and inform the stormwater management strategy.

- Location and design detail of communal devices (temporary or permanent) to achieve either water quality or hydrology mitigation or both
- Demonstration of an holistic treatment train approach to achieve water quality outcomes in line with Council document GD01 and the principles of water sensitive design.
- An assessment against the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 and the National Policy Statement for Freshwater Management 2020
- Geotechnical assessment report
- Earthworks and sediment control report.
- Archaeological heritage assessment report.
- Arboricultural report
- An assessment against the National Policy Statement - Urban Development 2020.
- Urban design assessment of the housing typologies for which consents are sought.
- The location, design and intended uses of all proposed publicly-owned open space
- Landscape Plans for all streetscapes and reserves to be vested, including hard and soft features – planting, fencing, retaining etc.
- Assessments of construction effects including noise, vibration, dust and traffic.

6. Do the applicants, or a company owned by the applicants, have any environmental regulatory compliance history in your region?

No major compliance issues have been identified for these companies.

7. Iwi and iwi authorities for the areas

Ngāi Tai ki Tāmaki; Ngāi Tai ki Tāmaki Tribal Trust, Beachlands
 s 9(2)(a) www.ngaitai-ki-tamaki.co.nz
 s 9(2)(a)

Ngāti Maru; Ngāti Maru Rūnanga Trust, Thames
 s 9(2)(a) www.ngatimaru.iwi.nz
 s 9(2)(a)

Ngāti Tamaoho; Ngāti Tamaoho Trust, Manukau
 s 9(2)(a) www.tamaoho.maori.nz
 Lucille Rutherturd s 9(2)(a)

Ngāti Te Ata; Te Ara Rangatu o Te Iwi o Ngāti Te Ata Waiohua, Waiuku
 s 9(2)(a)

Ngāti Whanaunga; Ngāti Whanaunga Incorporated, Coromandel
www.ngaatiwhanaunga.maori.nz
 Honey Renata s 9(2)(a)

Te Ahiwaru – Waiohua; Makaurau Marae Māori Trust, Mangere
www.makauraumarae.co.nz
 Kowhai Olsen s 9(2)(a)

Te Ākitai Waiohua; Te Ākitai Waiohua Iwi Authority, Mangere Bridge
 s 9(2)(a) www.teakitai.com
 Nigel Denny s 9(2)(a)

Waikato – Tainui; Te Whakakitenga o Waikato Incorporated, Hamilton
 s 9(2)(a) www.waikatotainui.com

Wikitoria Tane s 9(2)(a)
Kahurimu Flavell s 9(2)(a)

8. Relationship agreements under the RMA

No relationship agreements with iwi have been identified, in relation to section 18 or section 23(5) of the COVID FTC Act. It is recommended that the applicant ascertain the status of any iwi management documents directly with mana whenua.

Yours faithfully



Ian Smallburn
General Manager – Resource Consents

Attachments: Asset Owner / Specialist Responses

1. **Planning** – Auckland Council Plans and Places
2. **Infrastructure Funding** – Auckland Council Development Programmes Office
3. **Transport** – Auckland Transport
4. **Water and Wastewater** – Watercare Services Limited
5. **Stormwater** – Auckland Council Healthy Waters
6. **Engineering (general)** – Auckland Council Regulatory Engineering
7. **Parks** – Auckland Council Parks Planning
8. **Urban Design** – Auckland Council Urban Design Unit
9. **Streams and Wetlands** – Auckland Council Streamworks Specialist

Attachments: Elected Member Responses

1. **Local Board**
2. **Local Ward Councillor**

Asset Owner / Specialist Response

From: Plans and Places, Auckland Council

Date: 12/05/21

Overall Summary:

A high level assessment of the fast-track referrals against the relevant plans, policy statements and strategies has been undertaken.

The fast-track referral is out of sequence with the Future Urban Land Supply Strategy 2017 sequencing, which identifies the Drury East / Ōpāheke area as being development ready by 2028-2032 (Decade two, 1st half).

At a broad level, the proposal is not consistent with the Drury-Opāheke Structure Plan:

- In terms of land uses:
 - The Kiwi referral proposes retail activities supported by a network of connected streets and open spaces, consistent with the large centre identified in the DOSP.
 - The Fulton Hogan referral proposed 248 new detached dwellings, 28 residential superlots¹ and 8.27ha of open space, likely to result in lower density residential development compared with the THAB and Mixed Housing Urban identified in the DOSP.
 - The Oyster referral proposes 376 new dwellings in standalone and terraced typologies and 9 superlots, likely to result in lower density residential development compared with the THAB identified in the DOSP
- The referrals appear to provide the blue-green network in the DOSP (Fig 8) in relation to the Hingaia Stream which runs adjacent to the Kiwi property (a 4.1ha reserved proposed between stream alignment and development) and through the Fulton Hogan site (esplanade reserve proposed).
- The transport network identified by the DOSP for this area (Fig 7) will not be implemented at the same time as development. This includes the Drury Centre Station, upgrade of Waihoehoe Road to an FTN arterial, connector/local bus route on Fitzgerald Road, new east-west collector road south of Waihoehoe Road.

The NPS-UD seeks to achieve well-functioning environments that achieve housing choice, are supported by public transport, enable a variety of sites suitable for different business sectors, and support reductions in greenhouse gas emissions. The NPS-UD also seeks that local authority decisions are integrated with infrastructure planning and funding decisions. The referral areas are not supported by existing PT, and are likely to be difficult to service with new PT. This will likely lead to travel patterns that generate more greenhouse gas emissions compared with development integrated with PT infrastructure². Therefore, the referrals are unlikely to achieve a well-functioning urban environment.

The AUP(OP) RPS seeks a quality compact urban form that supports public transport and efficient provision of new infrastructure amongst other matters. B2.2.2(7) seeks to enable rezoning of FUZ land where this supports a quality compact urban form, provides for a range of housing types and employment choices for the area and integrates with the provision of infrastructure. The proposed expedited development of these areas will create urban pockets

¹ Medium to high density

² The Kiwi referral masterplan (Appendix 3) appears to reflect this with a lot of at-grade car parking shown to support proposed LFR

that are difficult to service with PT, and will not be supported by a train station until 2024/2025. As such, the referrals unlikely to achieve a compact urban form.

The Auckland Plan Development Strategy seeks a quality compact approach to growth. Part of this approach is managed expansion into future urban areas, in which future urban development aligns with the FULSS sequencing, and is supported by the required bulk infrastructure. A network of strong centres (including employment and other services and facilities) and neighbourhoods supported by a wide range of housing types and densities is sought. As discussed above, the referrals seek to develop the land ahead of the FULSS sequencing and necessary infrastructure required to mitigate their effects.

Plan Changes

The subject sites are within areas which are subject to private plan change applications. These are Plan Changes 48, 49 and 50 to the AUP(OP), described in the referral applications and attached planning reports.

The key themes arising from the plan change submissions are:

- Lack of integration of infrastructure planning and funding with land use, due to out-of-sequence development, effects on the infrastructure networks and funding implications for infra providers (AC, AT, NZTA)
- The sufficiency of stormwater provisions to implement the SMP and give effect to the NPSFM
- Iwi participation, consultation and engagement and incorporation of Te Aranga Principles in design (Ngāti Te Ata and Ngāti Tamaoho)
- Further archaeological assessment prior to development or subdivision should be undertaken (Heritage New Zealand Places Trust)

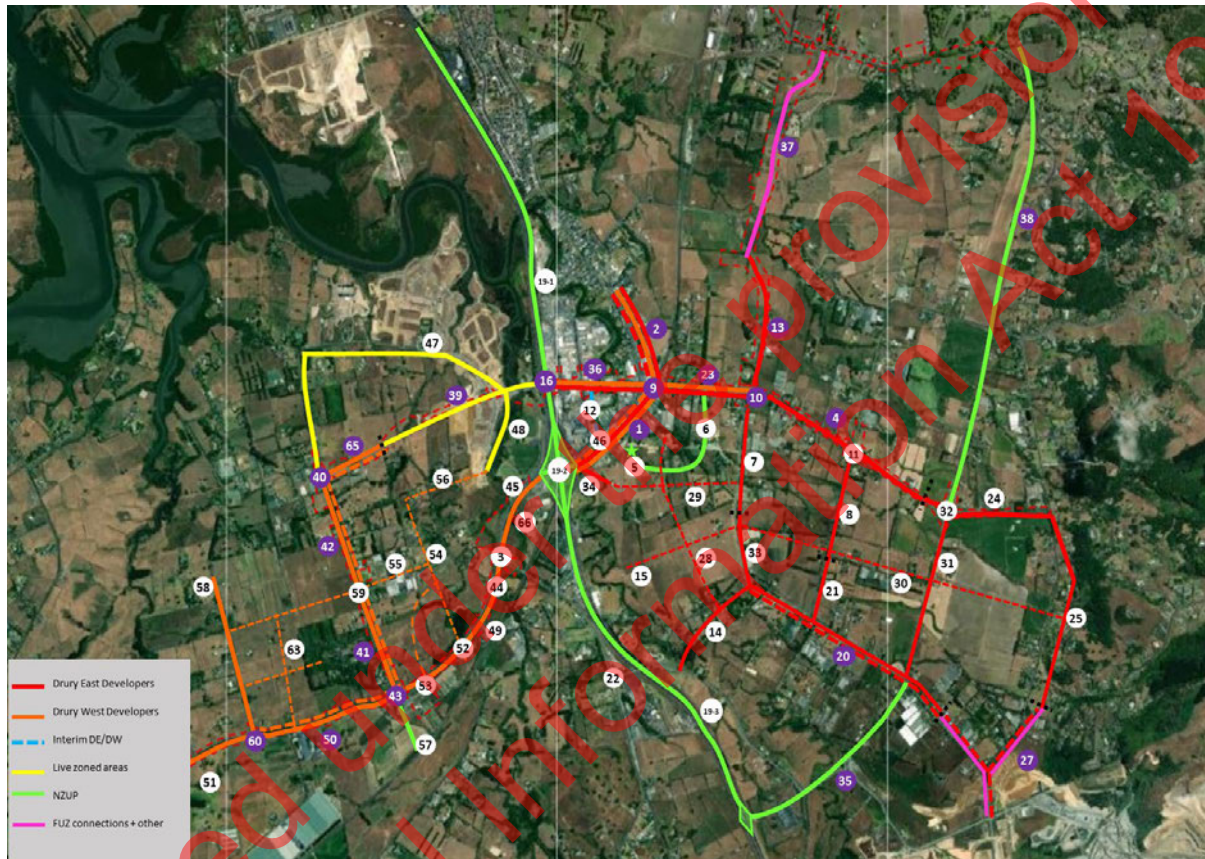
Asset Owner / Specialist Response

From: Ian Kloppers, Manager Infrastructure Delivery – Development Programme
Office, Auckland Council

Date: 17 May 2021

Overall Summary:

Map showing the transport infrastructure requirements in Drury



The map shows the significant transport infrastructure requirements to enable development in Drury (please refer to key below).

All the projects indicated on the map are critical to ensure an integrated sustainable urban development is achieved in Drury. Although some of the projects could be developed in stages, with an interim scope initially, upgraded to the ultimate form at a later stage, there is still a large number of projects required before any development can occur. Indicative cost estimates of these initial projects indicate a significant investment required, currently mostly unfunded. Given the uncertainty of some of the critical transport infrastructure, like Mill road, to be delivered through the NZUP investment programme, and the subsequent impact of same on other infrastructure, the possible funding shortfall could well range between \$400m and \$600m. The main drivers behind these projects, and the timing, staging, and sequencing of the projects are:

- To ensure proper Transit Oriented Developments (TOD) around the Rapid Transit Networks (RTN), with the focus on the stations included in the New Zealand Upgrade Programme (NZUP) investment.

- To enable an active mode network to ensure patrons can get to and from the RTN's using active modes.
- To ensure the desired Public Transport uptake is achieved.
- To ensure a strategic transport link between Drury East and Drury West to achieve safety, social, environmental and operational resilience.

All three plan changes, and consequently the Fast Track Applications, are out of sequence with regards to the Future Urban Land Supply Strategy (FULSS), and the intended delivery of strategic and significant infrastructure. Given the Fast Track Applications will precede the delivery of significant and critical transport infrastructure these Fast Track Applications, if granted, will in all probability cause fragmented and undesired urban outcomes.

The distance of the intended developments included in the Fast Track Applications, from the Drury Central Station and critical strategic transport networks, will result in a vehicle dominated urban environment, compromising all the desired safety, operation, environmental and social outcomes.

Key to transport projects map (not all projects have been listed)

1	Great South Road improvements - Waihoehoe Rd to Drury Interchange
2	Great South Road improvements - From Drury School to Waihoehoe Rd
4	Waihoehoe Rd East upgrades- from Fitzgerald Rd to before Cossey Rd (development boundary)
5	Drury Central Station (NZUP)
6	Drury Station Connection+ intersection (NZUP)
7	Fitzgerald Rd upgrades (from Waihoehoe Rd to First Stage development boundary , north of Brookefield)
8	Fielding Rd upgrades (from Waihoehoe Rd to development boundary)
9	Upgrade in Great South Road/Waihoehoe intersection/Norrie Rd
10	New intersection on Waihoehoe Rd/Fitzgerald Rd (including approach cross-sections)
11	Intersection upgrade Waihoehoe Rd/Fielding Rd/Appleby Rd
12	Interim walking, cycling and bus connections within Drury Centre
13	North-South Opaheke Arterial across development (up to Waihoehoe Stream)
14	Upgrade Brookefield Road from Fitzgerald to Quarry Rd+ New connection + Intersections on Quarry & Fitzgerald
15	New Collector road E-W from Fitzgerald Rd (collector 1) + Intersections
19	SH1 Upgrade
23	Waihoehoe Rd West upgrades- between Great South Road & Fitzgerald Rd
28	New collector in North-South direction parallel to Fitzgerald Rd
29	New collector in East-West direction between Flanagan & Fitzgerald Rd (collector 2)
30	2-lane internal collector between Fitzgerald & Drury Hills East-West direction
33	Upgrade Fitzgerald Rd from project 7 to Brookefield Rd
34	New Drury Interchange connection to Kiwi development
36	Bremner-Norrie Road east of SH1 up to Great South Road (overlap with project 12)
46	Upgrades in Great South Road/Firth Rd intersection (overlap with project 12)

Asset Owner / Specialist Response

From: Tessa Craig, Major Developments Interface Lead, Auckland Transport

Date: Wednesday 12th May 2021

Overall Summary:

Auckland Transport does not support the projects being accepted for fast track consenting. The AUP(OP) states that Future Urban zoned land should not be developed for urban purposes until it has been through a Plan Change process (refer Objective H18.2(1) of AUP(OP)). The Auckland Plan and Future Urban Land Supply Strategy provides the Development Strategy for Auckland, including the sequencing and timing for when future urban areas will be ready for development to commence which requires necessary underpinning zoning and bulk infrastructure to be in place. The Drury – Opāheke Structure Plan sets out the 30-year vision for the area and includes a well-connected transport network, with land development and infrastructure delivered in a highly coordinated manner. Infrastructure investment and implementation plans are key to enabling this vision. The projects are also not considered to align with the National Policy Statement on Urban Development 2020 (NPS-UD) and will not help to achieve the purpose of the Covid-19 (Fast-track Consenting) Act 2020, failing to contribute to a well-functioning urban environment (19(d)(iii)). It is considered more appropriate for these projects to proceed through existing Resource Management Act 1991 (RMA) private plan change and subsequent consent processes.

Auckland Council and Auckland Transport submissions on the private plan changes identify that:

- the development projects are out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy;
- there is insufficient infrastructure to support the applications and significant infrastructure spend is required to support the projects for which there is no approved/agreed funding or financing to address;
- there will be a significant impact on Auckland Council / CCO and/or third-party infrastructure; and
- there is the potential for significant adverse environmental effects to occur.

Auckland Transport has identified issues with:

- assumed timing of wider infrastructure projects needed to support this growth;
- a gap/lack of upgrades in the projects to the existing network needed to be in place ahead of development;
- assumptions about Auckland Transport funded public transport not reflecting the current reality with funding constraints; and
- that delivery of infrastructure requires third party land.

Auckland Transport as Road Controlling Authority

Strategic transport infrastructure is needed to service the whole growth area as identified in Future Urban Land Supply Strategy (FULSS) and identified by Supporting Growth Alliance (a partnership of Auckland Transport and Waka Kotahi). The FULSS informs the Auckland Plan Development Strategy, the spatial plan for Auckland as per the Local Government (Auckland Council) Amendment Act 2010. The FULSS and Development Strategy helps to inform wider network infrastructure asset planning and funding priorities

and, in turn, enables development capacity to be identified in a coordinated and cost-efficient way. 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”.

The applications propose interim upgrades to Waihoehoe Road and an interim safety upgrade to the Great South Road / Waihoehoe Road intersection. However, there are additional upgrades Auckland Transport has identified that need to be in place prior to any subdivision, new dwellings, retail or commercial development beyond those identified by the developers.

The discrepancies between what the developers propose to provide and what Auckland Transport consider to be necessary and in place ahead of any development are:

- Construction of the northern end of Drury Boulevard as the primary multi-modal access (not proposed to be provided in the fast track applications). Without a direct link in the north to the Drury Central station, the distance and circuitous route for active transport users (via Fitzgerald and Waihoehoe Road) would not deter car use, enable an integrated transport network, or manage adverse effects of traffic as set out in the objectives of E27 of the AUP(OP);
- The interim road upgrade of Waihoehoe Road will only be provided within the existing 20m wide corridor and will not meet the minimum standard for an arterial road (with no provision for back berms and reduced front berms, resulting in safety and utilities provision effects). To achieve an arterial road standard, third party land would be required;
- Only an ‘interim’ (does not include the final Collector road standard requirements) upgrade of Fitzgerald Road is being offered – this will result in a substandard road width without a safe, well connected cycle and pedestrian network- a key outcome identified in the structure plan (3.1.2.3(c)); and
- The interim reconstruction of Waihoehoe Road / Great South Road includes zebra crossings over two lanes on two of the arms of the roundabout which is not a safe outcome for active modes as vehicles on the inner lane have sightlines obscured by vehicles on the outside.

Allowing the three sites to be developed ahead of the infrastructure required to support sustainable or integrated development as envisaged and required by adopted Auckland Council strategies and plans will not cultivate a less car dependent lifestyle considered essential for future development in Drury, nor will a well-functioning urban environment result (purpose of COVID-19 Recovery (Fast-track Consenting) Act under 19(d)(iii)). The applicant asserts that the proposals are Transit Orientated Developments (TOD). However, as shown in the timelines provided by the applicants, dwellings would be occupied prior to the earliest forecast completion date of the Drury train station. It should also be noted a TOD walkable catchment is about 800m and, therefore, many of the dwellings will be further than this distance from the station. Without the required infrastructure, lower non-car mode share and PT uptake will result, and car travel will lead to increased carbon emissions, compromised urban form and projects not conducive to a TOD development. Significant pressure will be placed on existing access points from the motorway and local transport network if the required infrastructure is not in place to support multi-modal travel choices.

Auckland Transport does not have any funding identified in the RLTP to meet the shortfall in required infrastructure needed to support such development, nor is there any delivery agreement with developers. The applicant has stated diversion of existing public transport services or a provision of additional shuttle services (presumably to the train station) could be provided at the initial stage of development, although who would fund this is not known. There are no Auckland Transport funds allocated for bus services in the east of Drury Central station prior to start of FY 2027 (1st July 2027) and any funds are predicated on the delivery of the rail station. Therefore, there is a risk that the development will not receive the appropriate infrastructure required for a well-functioning urban environment nor the level of multi-modal accessibility anticipated by the applicant (and included in the assumptions for the developments). Frequent, reliable and attractive public transport options are a key outcome identified in the Drury – Opāheke structure plan (3.1.2.3(b)).

In addition, it is not clear whether required upgrades to Fitzgerald Road and Fielding Road would fit within the existing road corridor (again, third party land may be needed to meet the minimum standard as the details are not supplied), the Brookfield Road upgrade does not lead to anywhere (a connection with Quarry Road may be a network resilience issue), and the Waihoehoe over bridge will not provide an adequate active modes connection to the existing services in Drury within its current constrained width. The overall road network connectivity and resilience being proposed is not accepted - without connectivity and resilience this will lead to accessibility problems and issues with travel safety. For example, travel to the school (or other local amenities) in Drury is on the other side of Waihoehoe Road from Phase 1 of the residential development. Whilst the NPS UD considers out of sequence development, this is provided it would contribute to a well-functioning urban environment and would be well-connected along transport corridors (NPS UD Subpart 2, 3.8(2)(a) and (b)). These out of sequence projects do not meet this requirement.

Auckland Transport understands that the NZUP programme is currently undergoing a 're-baselining', to better understand the cost and strategic objectives of these major investments. This work may result in changes to the scope, cost and timing of these projects (which includes the Drury train stations, Mill Road Corridor and State Highway 1 Papakura to Drury South upgrade), representing a risk that the transport network that the applications rely upon will not be provided or in place ahead of the occupation of the first dwellings. The current private plan change process is the appropriate way to consider timing and triggers for development in accordance with likely funding from this programme or any other.

Auckland Transport as Asset Owner

Auckland Transport has concerns with the implications of the projects as an asset owner. There is a lack of mitigation proposed to address construction traffic effects on both the capacity and condition of existing roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will require pavement rehabilitation upgrades from the outset in order to safely and effectively accommodate the increased construction related traffic. This has not been considered or addressed by the developers. The draft RLTP has funding allocated to support the NZUP projects, however, it does not fund the additional

upgrades to the existing network identified as needed to support the residential and commercial prior to any development taking place.

Other comments

Auckland Transport is not supportive of the applications being accepted for fast track consenting as the proposals would not achieve land use transport integration or contribute to a well-functioning urban environment (section 19 (d)(iii)) and the transport infrastructure required to support sustainable development will not be in place ahead of the first phases of the development. It would be more appropriate for the projects to continue through the current RMA plan change process to allow an assessment at a more strategic level, ensuring the wider network impact could be addressed and mitigated. Auckland Council and Auckland Transport have lodged submissions to the private plan changes that cover these projects, identifying significant concerns.

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Asset Owner / Specialist Response

From: Tarso Luiz dos Santos Girio, Technical Lead Engineer, Watercare

Date: 12 May 2021

Overall Summary:

Background to all Proposals

Watercare has recently constructed transmission water and wastewater infrastructure in this area to service the Drury South Limited development at Quarry Road. This infrastructure has been upsized to enable the initial stages of the Drury Centre (Kiwi Property) development, the Drury East (Fulton Hogan) development and Waihoehoe (Oyster Capital) development. However, significant water and wastewater upgrades will be required to support the proposed full build-out of these developments and the wider Drury East area.

This area falls within the area serviced by Veolia water. In this area, Watercare is responsible for the operation and planning of the water supply and wastewater transmission networks. Veolia is responsible for operating and maintaining the local water and wastewater network in their area of service.

Comments on Each Proposal

Drury Centre (Kiwi Property)

The proposal for a mixed-use development located at Kiwi Property site at 1139, 155, 173 and 189 Fitzgerald Road; 61 Brookfield Road; and 108, 116, 120, 124, 132 Flanagan Road Drury, includes:

- A total of six superlots for large format retail (LFR) amounting to 45,200m² GFA is proposed on the western portion of the site and surrounding the ancillary car parking areas for this retail space, and
- A total of 13 superlots totalling 7.597ha of land for residential development, which will enable the construction of 400-600 dwellings, is planned to the east of the LFR.

No water and wastewater flow or water supply demand data were provided as part of this application.

Watercare confirms that the initial stages of the Drury Centre development can be serviced by the Watercare transmission network. All local water and wastewater network will need to be designed, constructed and funded by the developer.

Water Supply:

A new Bulk Water Supply Point (BSP) has been constructed at Flanagan Road adjacent to the Waikato Water Pump Station. This BSP has enough flow and pressure to service the proposed development. There is a new Ø450 local watermain that runs from Flanagan Road BSP along Waihoehoe Road and down Fitzgerald Road.

The developer shall design and construct a local water supply reticulation to connect from this BSP/local watermain to enable all sites within the development area to be supplied with potable water for domestic, commercial and firefighting purposes.

The construction of the local reticulated water supply network to service the development area shall be progressively developed to a fully networked distribution system with ring mains and multiple interconnections to ensure resilience and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Wastewater:

Watercare has installed the Southern Wastewater Network. This network has been installed to service the Drury South development but has been upsized to cater for some additional development. The Southern Wastewater Network includes the new Drury South Pump station and a rising main to connect the network into the Bremer road wastewater transmission main. The Drury South Pump station has a capacity to service 10,000 dwellings. It also includes a gravity wastewater main from the intersection of Brookfield and Fitzgerald Road.

The newly constructed infrastructure can accommodate the initial stages of the Drury Centre development. Beyond this, the infrastructure will need to be significantly upgraded. The timing and funding for this upgrade are not currently confirmed and will be subject to funding availability.

The extent of development proposed by Kiwi Property can be serviced by establishing a local network connecting to Watercare's transmission wastewater network.

The construction of the local wastewater network to service the development area shall be progressively developed to a fully networked distribution system and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Drury East (Fulton Hogan)

The first stage of the proposed development located at Drury East site at 86 and 94 Fitzgerald Road, 251 and 383 Waihoehoe Road, 65, 76 and 108 Fielding Road, Drury, includes:

- Up to 248 new residential units over 9.65ha of land, and
- 28 superlots totalling approximately 4.84ha of land, which will enable approximately 345 new residential units.

No water and wastewater flow or water supply demand data were provided as part of this application.

Watercare confirms that the initial stages of the Drury East development can be serviced by the Watercare transmission network. All local water and wastewater network will need to be designed, constructed and funded by the developer.

Water Supply:

A new Bulk Water Supply Point (BSP) has been constructed at Flanagan Road adjacent to the Waikato Water Pump Station. This BSP has enough flow and pressure to service this proposed development by Fulton Hogan. There is a new Ø450 local watermain that runs from Flanagan Road BSP along Waihoehoe Road and down Fitzgerald Road.

The developer is required to construct a 450mm water main along Waihoehoe Road to service the development and create a ring main to connect to the existing water main in Fitzgerald Road. This is to be fully funded by the development but may be subject to cost-share arrangements with the other developers.

The construction of the local reticulated water supply network to service the development area shall be progressively developed to a fully networked distribution system with ring mains and multiple interconnections to ensure resilience and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Wastewater:

Watercare has constructed the Southern Wastewater Network. This network can provide sufficient capacity for the first stage of the development. Beyond that, the wastewater network will need to be significantly upgraded. The timing for this is not confirmed and will be subject to funding availability.

The extent of development proposed by Fulton Hogan can be serviced by establishing local gravity reticulation connecting to Watercare's new transmission wastewater network.

The construction of the local reticulated wastewater network to service the development area shall be progressively developed to a fully networked distribution system and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Waihoehoe (Oyster Capital)

The proposed development located at Oyster Capital site at 76, 76A and 116, 136 and 140 Waihoehoe Road, Drury, includes:

- Up to 376 new residential units comprised of standalone and terrace housing in a variety of sizes and designs
- 9 superlots totalling 7.2 hectares of land for residential development, which will enable the development of approximately 270 dwellings on the western portion of the site.

No water and wastewater flow or water supply demand data were provided as part of this application.

There is currently no public water or wastewater local network reticulation available to service this Oyster Capital development area.

Watercare confirms that the initial stages of the development can be serviced with the necessary infrastructure to be designed and constructed by the developer.

Water Supply:

A new Bulk Water Supply Point (BSP) has been constructed at Flanagan Road adjacent to the Waikato Water Pump Station. This BSP has enough flow and pressure to service this proposed development by Oyster Capital. There is a new Ø450 local watermain that runs from Flanagan Road BSP along Waihoehoe Road and down Fitzgerald Road. A new 450mm water main will need to be extended down Waihoehoe Road.

The developer shall design and construct a local water supply reticulation to connect from this BSP/local watermain to enable all sites within the development area to be supplied with potable water for domestic, commercial and firefighting purposes.

The construction of the local reticulated water supply network to service the development area shall be progressively developed to a fully networked distribution system with ring mains and multiple interconnections to ensure resilience and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Wastewater:

While this development will in the future need to connect into the Opaheke wastewater catchment, that area is still Future Urban Land. Therefore, Watercare has agreed that this development can initially connect into the Drury South catchment. Beyond that, significant wastewater upgrades will be required. The timing of this is not known, as it will depend on funding availability.

The extent of development proposed by Oyster Capital can be serviced by establishing local gravity reticulation connecting to Watercare's new transmission wastewater main.

The construction of the local reticulated wastewater network to service the development area shall be progressively developed to a fully networked distribution system and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Asset Owner / Specialist Response

From: Paula Vincent, Principal Planning – Healthy Waters (Stormwater and Freshwater), Auckland Council
Danny Curtis, Principal Catchment Manager

Date: 11 May 2021

Overall Summary:

Auckland Council Healthy Waters (Healthy Waters) is the network utility operator for stormwater in the Auckland region and responsible for the overall management of stormwater and freshwater in the catchments that the three applications sit within. Healthy Waters is concerned how these applications, which are subsets of larger plan change applications in progress, will manage effects of stormwater so that management is integrated across the catchment and that any assets intended for future council ownership are fit for purpose.

Usually development applications (plan change and subdivisions) seek to have their stormwater discharges authorised via the council's region wide Network Discharge Consent requirements set out in Schedule 4 (see www.aucklanddesignmanual.co.nz/ndc). An SMP outlining how this would be achieved is required to be provided for plan changes and subdivision as part of councils' process. As these Fast Track Consenting applications are not changing the underlying land use to an urban zone we cannot authorise discharges under the NDC meaning that private discharge consents are needed. However, the applicant has indicated they intend to vest assets to Auckland Council Healthy Waters and transfer the discharge consent to us once the plan changes are operative. This makes it imperative that stormwater management is fit for purpose and done in consideration of the wider catchment.

Auckland Council Healthy Waters needs to be confident that effects are managed in an integrated way across the catchment. In summary the high level approach is consistent with discussions held to date however there is not the detail that would usually be provided at consent stage for Healthy Waters to be confident that the approach will be enacted effectively and avoid adverse effects.

Healthy Waters has reviewed the masterplan and vision documents, Infrastructure Report, Stormwater Reports and Ecology reports in the Fast Track applications. When reviewing the Fast Track application documents we have considered how well they reflect the Drury-Opaheke Structure Plan Stormwater Management Plan (final draft) which outlines the overall approach to be taken for stormwater management across the four catchments of the Drury-Opaheke Structure Plan. Also considered are the Stormwater Management Plans prepared in support of the individual Plan Changes that are still in progress (PC48, 49 and 50).

The management of flood waters is a big concern. The Slippery Creek catchment and Hingaia Stream catchment interact and flood waters from each affect the existing Drury Township. The streams in these catchments have very large upstream rural catchments and it has been identified that the best way to avoid increasing flood hazard

on the existing Drury town is to pass flow forwards from land zoned as Future Urban Area of which these Fast Track applications are part.

Drury Centre:

The Stormwater memo provided is consistent with information Healthy Waters holds on the catchment and is consistent with the Stormwater Management Plan prepared in support of the PC48 Drury Centre private plan change application. The memo is high level and lacks the detail needed for consents.

Auckland Council Healthy Waters should be consulted on consenting detail to ensure that flood risks and other effects are going to be effectively managed across the catchment; particularly:

- Sizing and location of the temporary flood attenuation proposed.
- Location and style of devices, particularly communal, for hydrology mitigation and water quality.

Drury East

The Stormwater memo provided is consistent with information Healthy Waters holds on the catchment and is consistent with the Stormwater Management Plan prepared in support of the PC49 Drury East private plan change application.

- Auckland Council Healthy Waters wishes to be consulted on consenting detail to ensure that assets intended to be vested to the council in the future are fit for purpose and that flood attenuation interventions work as intended.

Waihoehoe

The overall approach to managing flood risk and achieving stormwater outcomes is consistent with the Stormwater Management Plan lodged in support of the PC 50 Waihoehoe private plan change application.

Points to note:

- The identification of natural wetlands as currently defined in the NES-Freshwater looks to have altered some of the areas intended to be set aside as drainage reserves in the northern part of the site. Note council has not discussed or accepted that these areas should be in drainage reserve.
- If Wetland 1 is confirmed as being a natural wetland under the NES-Freshwater then attenuation of flood flows may need to change to ensure it remains hydrologically neutral.
- Auckland Council Healthy Waters wishes to be consulted on consenting detail to ensure that assets intended to be vested to the council in the future are fit for purpose and that flood attenuation interventions work as intended.

Asset Owner / Specialist Response

From:

Maria Baring – Project Manager Regulatory Engineering – Auckland Council
Zihao Lin – Development Engineer – Auckland Council

Date: 11/05/2021

Overall Summary:

We are opposed to the fast-track application as it is inconsistent with the ongoing plan changes (PC48, PC49 & PC50) that relate to the proposed development. There is a high likelihood of a substantial gap for funding due to the nature of the project.

The proposal lacks integration for infrastructure. Due to the large scale of infrastructure required to cater for the proposed development, we consider that there is a high risk that the proposed project may not be designed to cater for potential future developments, and the infrastructure may not be up to the standard we ultimately want to achieve.

At this stage, only high-level information is provided. We are concerned that we may have very limited opportunity to review the detailed design, which may lead to uncertainty whether the final product may be substandard.

To conclude, the project is not suitable for fast-tracking as it is inconsistent with a relevant national policy statement and it would be more appropriate for the project to go through the standard consenting process under the Resource Management Act 1991.

Parks Asset Owner / Specialist Response

From: Hester Gerber, Parks Planning Team Leader
Date: 12.05.2021

Overall Summary:

Background information:

The subject site is zoned Future Urban Zone and of note are the Infrastructure: National Grid Corridor Overlay - National Grid Yard Uncompromised and Infrastructure: National Grid Corridor Overlay - National Grid Subdivision Corridor overlays.

Key Issues from a Parks Planning Perspective

A key issue with the project going through the COVID-19 Recovery Act 2020 fast track consenting process is the potential for Auckland Council to inherit parks assets where they have not had the opportunity to assess and comment on prior to receiving them.

There is a risk that the vested assets Council may inherit are not to the same standard or consistent with those assets which go through the normal plan change, resource consent and engineering plan approval process, resulting in a financial burden not anticipated.

The Fastrack applications are subject to notified Private Plan changes reference 48, 49 and 50. It is recommended that the applications are declined in accordance with Section 23(5)(b) of the COVID-19 Recovery (Fast-track Consenting) Act 2020 and that the private plan changes are allowed to go through the normal process as per the Resource Management Act 1991.

There is a risk that the open spaces do not meet the provision targets within the Open Space Provision Policy 2016 and are not provided in locations that are accessible to people and communities as required by the Regional Policy Statement B2.7 and AUP Objectives H7.2.(1&2).

Parks Planning information, reports and assessment requirements:

- subdivision plans identifying public assets to be vested, and for private open space assets, whether there will be public access easements provided to allow public access through the private open space to the esplanade reserve.
- landscape plans sufficiently detailed to properly assess any proposed assets in the streetscape, reserves to be vested, stormwater assets, and accessways, along with boundary treatment adjoining open space.
- planting plans with a schedule of species to understand the extent of revegetation and mitigation provided.
- consideration of a body corporate or other management structure plan for the maintenance of any private open space.

This would provide Council with the means to determine factors such as:

- Whether open space, stormwater and streetscape assets are to be public or privately owned.
- Which streams within the site meet the requirements under s230 of the RMA so an assessment can be made whether esplanade reserve is triggered in accordance with s230 of the RMA and Rule E39.4.1(A5) of the AUP.
- Whether streetscape planting is appropriate. Council has significant experience in this area as an asset owner and promotes the Auckland Council Urban Ngahere (Forest) Strategy, species which provide attractive streetscapes including species which are also suitable from a maintenance perspective and are practical in their chosen location e.g. will not hinder the sight lines of drivers or reduce usability of footpaths over time.
- Whether any aspects of the design would require the approval of the Local Board or Governing Body to accept any proposed assets as delegated decision makers.

- Whether access ways to parks and reserves are suitable from a crime prevention through environmental design (CPTED) perspective. This includes assessing building orientation and fencing on properties adjoining parks and park accessways to ensure appropriate passive surveillance over these areas is provided. Accessway widths and gradients are also important for the safe movement of walkers and cyclists.
- Whether the interfaces between the development and any proposed open space are appropriate.
- Hard assets such as stormwater outfalls or retaining walls are designed and located where they do not reduce the amenity of the parks and reserves or impact future greenways.
- Whether any infrastructure or structures associated with the development will impact on the purpose and usability of open spaces proposed.
- Whether Parks and Community Facilities have the budget to maintain proposed open space assets.

Acquisition of land

Are there any reasons that you consider it more appropriate for the projects, or part of the projects, to continue to proceed through existing Resource Management Act 1991 (RMA) private plan change processes rather than the processes in the FTCA?

It is more appropriate for open space-related matters to proceed through existing RMA processes for the following reasons:

- Auckland Council takes a strategic approach and plans for integrated open space networks at a landscape scale in accordance with Auckland Council's Parks and Open Spaces Strategic Action Plan (2013), Parks and Open Space Acquisition Policy (2013) and Open Space Provision Policy (2016).
- The proposed fast-track consenting limits the council's ability to take a strategic landscape approach to open space acquisition as it only considers land the applicant's own or for which they have development options. It does not take account of, or engage with, adjoining landowners and involve them in the process.
- The RMA plan change process and resulting precinct plans provide a transparent starting point for discussion between the council and landowners/developers regarding acquisition of land for open space purposes and need.
- Precinct plans in the Auckland Unitary Plan would enable holistic open space planning for parks as well as esplanade reserve/riparian margin and stormwater management/floodplain land within the development areas and beyond.

How do these projects align with the Auckland Unitary Plan and the Drury-Opaheke Structure Plan?

Open space shown on Drury-Opaheke Structure Plan maps is indicative only, although it is based on Auckland Council open space policy.

Open space provision in the Private Plan Change 48, 49 and 50 areas was reviewed as part of the pre-lodgement assessment of the proposed plan changes. It has changed from what is shown in the structure plan and the council's revised expectations have been communicated to the plan change applicants.

For this reason, exact alignment with the structure plan is not considered essential by the council. However, alignment with open space policy is still considered paramount.

How do these projects align with the National Policy Statement for Urban Development?

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.

The proposal does not provide assurance that community infrastructure (open spaces) will be available when required, so is not in accordance with this NPS. The Council submission to the PPC 48, 49, and 50 indicates what the provision should be and provides indicative locations of these local parks. The applicant has shown the open space on their Movement & Open Space context plan prepared by B&A in App 12_Context Maps for Waihoehoe and Drury Centre fast track applications as being outside the Fast track application land. Council's provision policy would require this open space land within the Fast track application land to meet the criteria. By indicating these neighbourhood parks outside the Fast track land, this transfers the responsibility to neighbouring sites that may or may not have plans to develop in the future providing uncertainty as to whether appropriate open space land would be available to serve the community that will be created by the development areas of Waihoehoe, Drury Centre and Drury East. This would be a reason for decline under section 23 (5)(c) of the Covid-19 Recovery (Fast-track Consenting) Act 2020.

Private Plan Changes 48, 49 and 50 relate to these projects. How do the concerns raised in Council's submissions to these plan changes relate to these projects?

The council communicated its revised open space expectations shown in figure 1 to the three applicants during pre-lodgement discussions on the proposed plan changes.

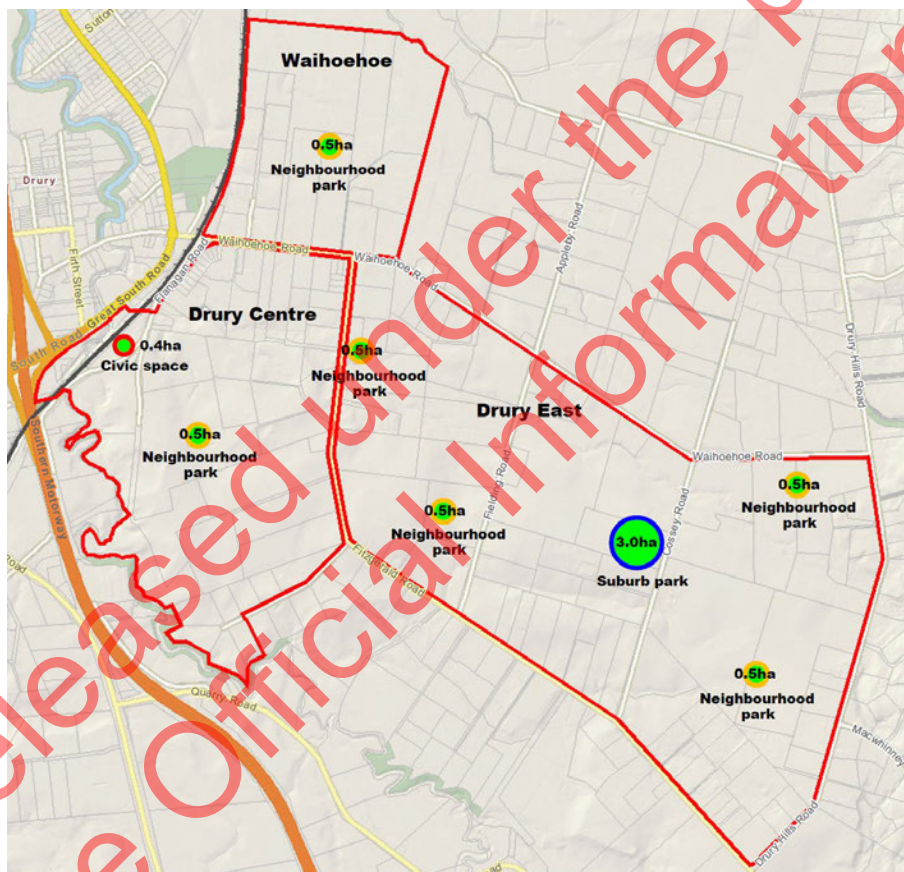


Figure 1

Based on an assessment of the structure plans in the fast-track applications against the revisions, which accurately reflect Auckland Council open space policy, we have the following comments:

Drury Centre

- The proposed 'Hingaia Reserve' (largely on a flood plain and beneath high voltage electricity transmission lines) and internal open spaces (wrong location, size and configuration) are not consistent with council open space policy (assuming council ownership is envisaged).
- The council originally stated it will seek to acquire a neighbourhood park where it is shown on the indicative open space location plan at Figure 1. Further assessment undertaken through the plan change process and at s42A reporting stage provides a more central location, consistent with council open space provision metrics which will help create an equitably distributed open space network in conjunction with proposed parks in surrounding areas consistent with council open space policy, and this is within Kiwi Property's development area.
- A publicly consulted plan change would be helpful to notify potentially affected landowners of the council's preferred neighbourhood park location.

Drury East

- An analysis of indicative open space locations on the plan at Figure 1 identifies that none of the indicative open spaces shown sit within Fulton Hogan's development area.
- A publicly consulted plan change would be helpful to notify the affected landowners of the council's preferred park locations on their land.
- The applicant has shown a number of 'Parks and reserves (to vest)' on their masterplan which would not be supportable for acquisition by the council for open space purposes: Lot 1000 (990m²); Lot 1001 (502m²); Lot 1013 (1653m²). Clarification is needed regarding the purpose of these 'parks and reserves' and the rationale for the expectation that the council would assume ownership of them – even at no capital cost.

Waihoehoe

- No neighbourhood park is shown within the Oyster Capital development area. This is not necessarily problematic as the council's preferred neighbourhood park location could feasibly be accommodated on 112 Waihoehoe Road which is partially enclosed by the development area.
- The plan change process where open space was indicated on a precinct plan would be helpful to notify the affected landowners of the council's preferred park location on their land.

What reports and assessments would normally be required by the Council for a project of this nature in this area?

Prior to lodgement of a resource consent application the location of all proposed publicly-owned open space would be assessed against council policy and agreed in principle by Community Investment (local parks), Parks Planning (esplanade reserves) and Healthy Waters (stormwater management areas, including floodplains). Auckland Transport would agree the location and width of road to road pedestrian accessways.

Apart from esplanade reserve or land vested for stormwater management purposes through regulatory processes all open space acquisitions require approval by the governing body of Auckland Council. Political reporting of proposed open space acquisitions is usually only undertaken following adoption of a plan change or upon granting of a resource consent.

Overall position of Parks Planning

Overall, it is considered that measures will need to be put in place under the COVID-19 Recovery Act 2020 fast track consenting process to ensure Council is able to provide sufficient input to decisions around the acquisition of land and the acceptance of any proposed vested assets such as playgrounds, walkways, and street landscaping. This is to ensure Auckland Council receives vested park, reserve and streetscape assets that are meeting the need of communities, to the normal standard and consistent with those that have gone through a normal resource consent process.

Conclusion

Should the EPA decide to allow the development to go through the Covid-19 Fast Track process, it is recommended that the proposal address all information requirements from a Parks perspective supplemented by a suitable assessment for the matters of concern. The applicant should also be made aware of any political decisions that are required for proposed vested assets (off-setting mitigation on asset owner land or proposed land for vesting, land acquisition, easements, reserve embellishments etc.) which may impact on the delivery of the project.

Prepared by: *Maylene Barrett, Principal Specialist – Parks, Sports and Recreation*
Ashleigh Richards, Senior Parks Planner – Parks, Sports and Recreation

Parks Agency Lead:



Hester Gerber
Parks Planning Team Leader
Parks, Sports and Recreation

Released under the provision of
the Official Information Act 1982

Asset Owner / Specialist Response

From: Frank Pierard, Principal (Acting) Urban Design, Auckland Council

Date: 12 May 2021

Overall Summary:

1. Overall, from an urban design perspective I have fundamental concerns with the three applications due to the uncertainties regarding the required transport infrastructure and current lack of integration with the natural environment and surrounding context. It is also considered that the fast-track consenting process will be an inappropriate methodology to assess the merits of this proposal for the following reasons:

Council Strategy & Policy:

2. The application sites are zoned future urban and although future urban development is anticipated, Private Plan Changes relating to these areas are still being processed by Council, therefore fundamental matters relating to this new urban growth area are yet to be determined.
3. In order to achieve quality urban development outcomes anticipated from Council strategies including the Auckland Plan, Future Urban Land Supply Strategy (FULSS) and the Auckland Unitary Plan (AUP) regional policy, there needs to be integration and alignment between the planning and delivery of development with the provision of supporting infrastructure. It's premature to consider these proposals under their underlying rural production zoning.

Supporting Infrastructure:

4. There are uncertainties regarding the staging, timing and funding for critical transport infrastructure and associated network operation improvements necessary to support growth in this area.
5. There could be significant impacts on the existing transport infrastructure if there is an inability to provide a viable and effective public transportation network in this area. The inclusion of this essential infrastructure is integral in promoting active transport modes and creating walkable and well-connected neighbourhoods which seek to reduce car dependency and reduce congestion issues and greenhouse gas emissions.
6. Further information is required to assess and understand the movement routes, walkability and connectivity achieved between the train station location and the proposed areas designated for the more intensive residential development¹.
7. There are significant concerns that the development proposals will not achieve well-functioning urban environments².

¹ This is particularly relevant to the Waihoehoe (Oyster Capital) development proposal.

² It is important to understand the implications from the National Policy Statement – Urban Development (NPS-UD) which Council is currently developing its policy context relating to assessment criteria and qualifying matters. This is critical given the intention of extending a Rapid Transit Network through this area.

Environmental Effects:

8. There are significant concerns regarding the lack of clarity and information on how the stream networks, floodplain areas, esplanade reserves, open space, stormwater and bulk earthworks will be integrated, treated and managed throughout the subject site and wider context³.
9. Appropriate Unitary Plan provisions such as a precinct plan(s) need to be established to provide certainty regarding the broader connectivity in the area and the integration with other parcels of land yet to be rezoned. The detailed master planning work typically required for large areas like this is critical in creating a well-connected and integrated development that responds appropriately to transitioning from a rural to an urban environment.

³ This wider context also relates to the significant flooding issues associated with the Opaheke catchment.

Specialist Response

From: *Fiona Harte, Senior Specialist (Earth and Streamworks), Specialist Unit, Resource Consents – Auckland Council*

Date: 12 May 2021

Overall Summary:

Upon review of the Ecology reports and pre-liminary plans the 3 sites (Drury Centre, Drury East and Waihoehoe), all sites seek to avoid the majority of effects to freshwater bodies in terms of the matters under chapter E3 of the Auckland Unitary Plan and the National Environmental Standard for Freshwater. All sites propose to enhance freshwater features that are proposed to be retained. Drury Centre proposed to retain all streams and wetlands, Drury east proposes to retain approximately 80%, and the Waihoehoe site will likely result in some small areas of impact from road crossings over streams. Culverts will be required to provide for fish passage, however, this would be addressed at detailed design stage.

Although the majority of streams are proposed to be retained across the three sites, there is no note of 'functional need' or application of the effects management hierarchy in regard to whether these streams need to be reclaimed in order to develop the site or if there are alternative designs that avoid reclamation.

The stream and wetland classifications provided within the corresponding Ecology reports for each site seem relatively accurate when reviewing GIS aerials and Auckland Council's modelled stream and overland flow paths, however, confirmation on the extent and nature of wetland and stream classifications can only be verified upon visiting the sites.

The Drury Centre report states that the works for the wastewater pipe within 100m of a natural wetland will not result in any drainage. The Drury East application states that the wetland area will be protected.

This could be of concern in regard to the NESFW(2020) as no specific assessments have been provided that detail whether it is possible to develop these sites without draining the wetlands. Earthworks or take, use, dam, diversion or discharge of water that results in partial or total drainage of a natural wetland is a prohibited activity under regulation 53 of the NESFW(2020). However, the developments should be able to design in a manner that avoids drainage of these wetlands. Careful consideration will be required in regard to, maintaining sufficient ground and surface flows via appropriate design and management of earthworks, catchment analysis and stormwater management options.

An analysis of the objectives and policies of chapter E3 of the AUP:OP and NPSFM(2020) have not been provided. However, should the proposals be designed to avoid drainage of any natural wetlands, ensure fish passage is maintained and demonstrate a functional need with regard to reclamation and application of the effects management hierarchy, consistency with the objectives and policies of the AUP:OP and NPSFM(2020) should be achievable.

Asset Owner / Specialist Response

From: Tim O'Grady – Principal Specialist Regulatory Compliance

Date: 17/05/2021

Overall Summary:

Upon request compliance monitoring have looked at the compliance enforcement history of:

- Kiwi Property Holdings
- Oyster Capital Limited
- Fulton Hogan Land Development Limited

There are no found enforcement actions against Kiwi Property Holdings and Oyster Capital Limited. I note that Kiwi Property Holdings often use different companies/subsidies for developments.

Fulton Hogan is also a large entity that has multiple companies for its activities. There are a number of abatement notices issued to Fulton Hogan Land Development Limited in our system – however these are relating to a “small sites” project where a proactive compliance team carry out visits on building sites, and issue abatement notices for breach of AUP erosion and sediment control standards.

There are no significant outstanding compliance concerns for the 3 abovementioned parties that I am aware of.

Comment from Franklin Local Board

Request from the Ministry for the Environment on referral of the following projects:

- Drury Centre - Kiwi Property Holdings No 2 Limited (26 hectares)
- Drury East Stage 1 - Fulton Hogan Land Development Limited (36.5 hectares)
- Waihoehoe Precinct - Oyster Capital Limited (34.7 hectares)

From: Local Board Chair Andy Baker, Franklin Local Board

Date: 12 May 2021

Overall Summary:

The Local Board has previously resolved feedback on the plan changes proposed by these applicants whereby we have raised concerns in regard to how the council family provided and other infrastructure required to give effect to these proposed developments is to be funded.

The AUP has identified areas for growth in these areas through the Future Urban Zone (FUZ) and the Future Urban Land Supply Strategy (FULSS) which stages development in the FUZ based primarily on ability to sequentially provide infrastructure to give effect to that development.

These applications (PPC and the fast tracking for portions of the PPC area) are not in line with the FULSS and as such the applicants must be required to show how the funding and provision gap is to be achieved.

Even partial development as proposed through the fast tracking will require Council to change investment planning meaning it is likely we will be required to consider the removal of funding from other areas of development or priorities to accommodate provision of complimentary services and amenity within these areas.

There is no information being shared by any of the applicants as to how or if they have considered the implications these out of sequence development plans are to be mitigated by Council including the Local Board.

Should these applications be accepted, we request that the applicants be required to engage directly with the Local Board to ensure that what they deliver in regard to public amenity and design outcomes are in line with what they have previously presented to the Local Board. We are concerned that this process may lead to poor outcomes and significant variation to the master plans provided and discussed previously.

With the Drury centre developments providing a greenfield creation of a new metropolitan centre (the size of a new city in NZ), the Local Board sees the opportunity to create a new standard in terms of design and offerings and would be extremely disappointed for that opportunity to be lost through a fast track process.

We understand the desire to get cracking on the development but ask that our questions and concerns are answered and considered.

Comment from Local Ward Councillor

Request from the Ministry for the Environment on referral of the following projects:

- Drury Centre - Kiwi Property Holdings No 2 Limited (26 hectares)
- Drury East Stage 1 - Fulton Hogan Land Development Limited (36.5 hectares)
- Waihoehoe Precinct - Oyster Capital Limited (34.7 hectares)

From: Bill Cashmore, Deputy Mayor | Franklin Ward Councillor

Date: 9 May 2021

Overall Summary:

- The scale of the Drury developments and the time frames involved are considerable and complex.
- There are literally billions being invested in infrastructure and there are some short falls and or timing of infrastructure delivery challenges. Auckland council staff have been working on this for some time.
- Each Private Plan Change can not , in my view, be investigated separately from the others in the Drury area. Critical infrastructure has service points across all the developments.
- The developers' land holdings as they currently exist do not enable an effective transport system. Development progression on the current footprint would not deliver the optimal outcome that should be required.
- There is going to be substantial employment generated in the Drury area over the next 25 years. The Stevenson's industrial park is pretty much all sold and just awaiting the roading and underground infrastructure to be delivered. The retail build out will add to the employment created by the industrial development .
- The build time lines need to be well understood so that the infrastructure can be delivered on the correct time frame. Above and below ground.
- I remain unconvinced that a fast track consenting process is the right model for this large development.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Auckland Transport
Contact person (if follow-up is required)	Tessa Craig – Major Developments Interface Lead, Planning and Investment
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Drury Centre ("Project" or "Application")
General comment	<p>Auckland Transport does not support the Project being accepted for fast track consenting. Drury Centre is already subject to a private plan change process (PPC 48) under the Resource Management Act 1991 (RMA) with a hearing commencing in July. It is considered more appropriate for the Project to proceed through existing RMA private plan change processes rather than the COVID-19 Recovery (Fast-track Consenting) Act 2020 (Covid Act). The development will not help achieve the purpose of the Covid Act given a well-functioning environment will not result due to the misalignment between the timing to provide the minimum necessary infrastructure and services ahead of the first dwellings being occupied (indicated as 2022). The project does not align with the Auckland Unitary Plan (Operative in Part) (AUP(OP)), the Drury-Opāheke Structure Plan or the National Policy Statement on Urban Development 2020 (NPS UD). There is a significant funding shortfall which is not able to be resolved in the fast track time frames laid out by the developer.</p>
Other considerations	<p>The AUP(OP) states that Future Urban zoned land should not be developed for urban purposes until it has been through a plan change process (refer Objective H18.2(1) of AUP(OP)). The Auckland Plan and Future Urban Land Supply Strategy (FULSS) provides the Development Strategy for Auckland, including the sequencing and timing for when future urban areas will be ready for development to commence which requires necessary underpinning zoning and bulk infrastructure to be in place.</p> <p>The Drury – Opāheke Structure Plan sets out the 30-year vision for the area and includes a well-connected transport network, with land development and infrastructure delivered in a highly coordinated manner. Infrastructure investment and implementation plans are key to enabling this vision. It is considered more appropriate for the Project to proceed through the existing RMA private plan change processes which are already progressing, and (if PPC 48 is approved) subsequent consent processes.</p> <p>Auckland Council and Auckland Transport submissions on PPC 48 (and other significant private plan changes in the area, two of which are similarly subject to proposals for referral under the Covid Act: PPC 49 (Drury East) and PPC 50 (Waihoehoe Precinct)) identify that:</p> <ul style="list-style-type: none"> the development projects are out of sequence with the Auckland Plan Development Strategy and FULSS; there is insufficient infrastructure to support the applications and significant infrastructure spend is required to support the projects for which there is no approved/agreed funding or financing to address;

- there will be a significant impact on Auckland Council / CCO and/or third-party infrastructure;
- there is the potential for significant adverse environmental effects to occur.

Strategic transport infrastructure is needed to service the whole growth area as identified in FULSS and identified by Supporting Growth Alliance (a partnership of Auckland Transport and Waka Kotahi). The FULSS informs the Auckland Plan Development Strategy, the spatial plan for Auckland as per the Local Government (Auckland Council) Amendment Act 2010. The FULSS and Development Strategy helps to inform wider network infrastructure asset planning and funding priorities and, in turn, enables development capacity to be identified in a coordinated and cost-efficient way. Any misalignment between the timing of infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is “development ready”.

Auckland Transport does not have funding identified in the RLTP to meet the shortfall in required infrastructure needed to support such development, nor is there any delivery agreement with developers. The applicant has stated that diversion of existing public transport services or a provision of additional shuttle services (presumably to the proposed Drury Central train station) could be provided at the initial stage of development, although who would fund this is not known. There are no Auckland Transport funds allocated for bus services in the east of Drury Central train station prior to start of Financial Year 2027 (1st July 2027) and any funds are predicated on the delivery of the rail station. Therefore, there is a risk that the development will not receive the appropriate infrastructure required for a well-functioning urban environment nor the level of multi-modal accessibility anticipated by the applicant (and included in the assumptions for the developments). Frequent, reliable and attractive public transport options are a key outcome identified in the Drury – Opāheke Structure Plan (3.1.2.3(b)).

The timeline provided by the applicant shows that the first dwellings would be ready for occupation at the start of 2024. The Drury Central train station will not be delivered until 2025 at the earliest. The other New Zealand Upgrade Programme (NZUP) projects (including Mill Road) are undergoing a 're-baselining', to better understand the cost and strategic objectives of these major investments. This work may result in changes to the scope, cost and timing of these projects. In addition, as addressed above, no funding has been allocated any funding for public transport services in Drury until after the train station opens. Upgrades to the existing network to support active modes are also unfunded. The lack of complementary supporting infrastructure will put pressure on existing site access points, put modal aspirations at risk, and will result in increased carbon emissions. This results in a compromised urban form and is not conducive to Transit Orientated Development. Given these issues, the plan change process under the RMA, with the full participation of Auckland Council and infrastructure providers such as Auckland Transport, is the appropriate process to consider *inter alia* timing and infrastructure triggers for development.

The applicant identifies that the site will initially be mainly accessible via the new Pitt Road / Fitzgerald Road intersection. Without a direct link to the north via what the private plan change application refers to as the 'Drury Boulevard or Key retail street', access to the proposed Drury Central train station would presumably be via access from Waihoehoe Road via Fitzgerald Road. This would result in a poor multi modal connection given the long and circuitous route active transport users would need to take to access the station. Travel by car is, therefore, likely to be the preferred mode of transport. Direct safe and convenient access should be provided to the train station from the proposed development location from the first occupation of dwellings/commercial floor space.

The project includes interim upgrades to Waihoehoe Road, an interim safety upgrade to the Great South Road / Waihoehoe Road intersection and an upgrade to Brookfield Road in the south. The interim measures do not meet Auckland Transport standards and, as such put vulnerable users at risk which will affect modal aspirations and will not align with a Vision Zero approach (this approach aligns with the Governments' Road to Zero Strategy 2020-2030). However, there are additional upgrades Auckland Transport has identified that need to be in place prior to any subdivision, new dwellings, retail or commercial development. The discrepancies between what the developer proposes to provide and what Auckland Transport considers to be necessary and in place ahead of any development include:

- Construction of the northern end of Drury Boulevard as the primary multi-modal access (not proposed to be provided as part of the project);
- The interim road upgrade of Waihoehoe Road will only be provided within the existing 20m wide corridor and will not meet the minimum standard for an arterial road (no provision for back

	<p>berms and reduced front berms resulting in safety effects and challenges with utilities provision). To achieve an arterial road standard, third party land would be required;</p> <ul style="list-style-type: none"> • Only an interim upgrade of Fitzgerald Road is being offered. This is a substandard road without a safe, well connected cycle and pedestrian network (a key outcome identified in the structure plan (3.1.2.3(c)). A full upgrade of Fitzgerald Road is required; • The interim reconstruction of Waihoehoe Road / Great South Road intersection is limited to improvement for active mode access (zebra crossings over two lanes as proposed on two of the arms of the roundabout is not a safe outcome as vehicles on the inner lane might not see pedestrians); and • Waihoehoe Road includes an overbridge into the existing Drury centre where the school and several other local amenities are located. The existing bridge does not adequately provide for active modes and needs upgrading as part of the Waihoehoe Road improvements. This is not proposed as part of the Project. <p>Brookfield Road is proposed to be upgraded by the applicant as interim work, but in the current proposal the road does not connect to the west (it is a dead-end road). Any request from the applicant to create a connection from Brookfield Road to Quarry Road may give rise to a network resilience issue.</p> <p>Allowing the site to be developed ahead of the infrastructure required to support sustainable development will not cultivate the less car dependent lifestyle which is considered essential for future development in Drury, nor will a well-functioning urban environment result as under Sections 19(d)(iii) & (vii) of the Covid Act.</p> <p>The transport memo provided with the Application states public transport and active modes are at the heart of the development philosophy, however, Auckland Transport does not have any funds allocated for bus services in the east of Drury Central train station prior to start of Financial Year 2027 (1st July 2027). The Application describes the development as transit orientated, however, this cannot be the case when there is no public transport in place (the earliest the train station would open is 2025, the earliest dwelling occupation is indicated as 2024) and the distance to the station is greater than 800m (which is beyond what can be considered a walkable catchment). This will result in a car-dependent development. Auckland Transport also has concerns with the implications of the Project as an asset owner. There is a lack of mitigation proposed to address construction traffic effects on both the capacity and condition of existing roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will require pavement rehabilitation upgrade from the outset in order to safely and effectively accommodate the increased construction related traffic. This has not been considered or addressed by the applicant.</p> <p>The site is located within the Future Urban zone under the AUP(OP) where development should not be compromised by premature subdivision, use or development. The Drury-Opāheke Structure Plan clearly states land development and infrastructure delivery should be highly coordinated. Any misalignment between development and the required transport infrastructure being in place will not result in a well-functioning urban environment contrary to the NPS UD and failing to achieve the purpose of the Covid Act.</p>
<p>[Insert specific requests for comment]</p>	<p>Click or tap here to insert responses to any specific matters the Minister is seeking your views on.</p>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Auckland Transport
Contact person (if follow-up is required)	Tessa Craig – Major Developments Interface Lead, Planning and Investment
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Drury East Stage 1 ("Project" of "Application")
General comment	<p>Auckland Transport does not support the Project being accepted for fast track consenting. Drury East is already subject to a private plan change process (PPC 49) under the Resource Management Act 1991 (RMA) with a hearing commencing in August. It is considered more appropriate for the Project to proceed through existing RMA private plan change processes rather than the COVID-19 Recovery (Fast-track Consenting) Act 2020 (Covid Act). The development will not help achieve the purpose of the Covid Act given a well-functioning environment will not result due to the misalignment between the timing to provide the minimum necessary infrastructure and services ahead of the first dwellings being occupied (indicated as 2022). The project does not align with the Auckland Unitary Plan (Operative in Part) (AUP(OP)), the Drury-Opāheke Structure Plan or the National Policy Statement on Urban Development 2020 (NPS UD). There is a significant funding shortfall which is not able to be resolved in the fast track time frames laid out by the developer.</p>
Other considerations	<p>The AUP(OP) states that Future Urban Zone land should not be developed for urban purposes until it has been through a plan change process (refer Objective H18.2(1) of AUP(OP)). The Auckland Plan and Future Urban Land Supply Strategy (FULSS) provides the Development Strategy for Auckland, including the sequencing and timing for when future urban areas will be ready for development to commence which requires necessary underpinning zoning and bulk infrastructure to be in place.</p> <p>The Drury – Opāheke Structure Plan sets out the 30-year vision for the area and includes a well-connected transport network, with land development and infrastructure delivered in a highly coordinated manner. Infrastructure investment and implementation plans are key to enabling this vision. It is considered more appropriate for these projects to proceed through existing RMA private plan change processes which are already progressing, and (if PPC 49 is approved) subsequent consent processes.</p> <p>Auckland Council and Auckland Transport submissions on PPC 49 (and other significant private plan changes in the area, two of which are similarly subject to proposals for referral under the Covid Act: PPC 48 (Drury Centre) and PPC 50 (Waihoehoe Precinct)) identify that:</p> <ul style="list-style-type: none"> the development projects are out of sequence with the Auckland Plan Development Strategy and FULSS; there is insufficient infrastructure to support the applications and significant infrastructure spend is required to support the projects for which there is no approved/agreed funding or financing to address;

- there will be a significant impact on Auckland Council / CCO and/or third-party infrastructure;
- there is the potential for significant adverse environmental effects to occur.

Strategic transport infrastructure is needed to service the whole growth area as identified in FULSS and identified by Supporting Growth Alliance (a partnership of Auckland Transport and Waka Kotahi). The FULSS informs the Auckland Plan Development Strategy, the spatial plan for Auckland as per the Local Government (Auckland Council) Amendment Act 2010. The FULSS and Development Strategy helps to inform wider network infrastructure asset planning and funding priorities and, in turn, enables development capacity to be identified in a coordinated and cost-efficient way. Any misalignment between the timing of infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is “development ready”.

Auckland Transport does not have funding identified in the RLTP to meet the shortfall in required infrastructure needed to support such development, nor is there any delivery agreement with developers. The applicant has stated that diversion of existing public transport services or a provision of additional shuttle services (presumably to the proposed Drury Central train station) could be provided at the initial stage of development, although who would fund this is not known. There are no Auckland Transport funds allocated for bus services in the east of Drury Central train station prior to start of Financial Year 2027 (1st July 2027) and any funds are predicated on the delivery of the rail station. Therefore, there is a risk that the development will not receive the appropriate infrastructure required for a well-functioning urban environment nor the level of multi-modal accessibility anticipated by the applicant (and included in the assumptions for the developments). Frequent, reliable and attractive public transport options are a key outcome identified in the Drury – Opāheke Structure Plan (3.1.2.3(b)).

The timeline provided by the applicant shows that the first dwellings would be ready for occupation at the start of 2024. The Drury Central train station will not be delivered until 2025 at the earliest. The other New Zealand Upgrade Programme (NZUP) projects (including Mill Road) are undergoing a 're-baselining', to better understand the cost and strategic objectives of these major investments. This work may result in changes to the scope, cost and timing of these projects. In addition, as addressed above, no funding has been allocated for public transport services in Drury until after the train station opens. Upgrades to the existing network to support active modes are also unfunded. The lack of complementary supporting infrastructure will put pressure on existing site access points, put modal aspirations at risk and will result in increased carbon emissions. This results in a compromised urban form and is not conducive to Transit Orientated Development. Given these issues, the plan change process under the RMA, with the full participation of Auckland Council and infrastructure providers such as Auckland Transport, is the appropriate process to consider *inter alia* timing and infrastructure triggers for development.

The Project includes interim upgrades to Waihoehoe Road and an interim safety upgrade to the Great South Road / Waihoehoe Road intersection. However, there are additional upgrades Auckland Transport has identified that need to be in place prior to any subdivision, new dwellings, retail or commercial development. The interim measures proposed by the Applicant do not meet Auckland Transport standards and, as such, put vulnerable users at risk which will affect modal aspirations and will not align with a Vision Zero approach (this approach aligns with the Governments' Road to Zero Strategy 2020-2030). The discrepancies between what the developer proposes to provide and what Auckland Transport considers to be necessary and in place ahead of any development include:

- The interim road upgrade of Waihoehoe Road will only be provided within the existing 20m wide corridor and will not meet the minimum standard for an arterial road (no provision for back berms and reduced front berms resulting in safety effects and challenges with utilities provision). To achieve an arterial road standard, third party land would be required;
- Only an interim upgrade of Fitzgerald Road is being offered. This is a substandard road without a safe, well connected cycle and pedestrian network - a key outcome identified in the structure plan (3.1.2.3(c)). The full upgrade of Fitzgerald Road is required;
- The interim reconstruction of Waihoehoe Road / Great South Road intersection is limited to improvement for active mode access (zebra crossings over two lanes as proposed on two of the arms of the roundabout is not a safe outcome as vehicles on the inner lane might not see pedestrians). Auckland Transport has identified the need for a dual lane roundabout at this intersection;

	<ul style="list-style-type: none"> Waihoehoe Road includes an overbridge into the existing Drury centre where the school and several other local amenities are located. The existing bridge does not adequately provide for active modes and needs upgrading as part of the Waihoehoe Road improvements. This is not proposed as part of the Project. <p>Allowing the site to be developed ahead of the infrastructure required to support sustainable development will not cultivate the less car dependent lifestyle which is considered essential for future development in Drury, nor will a well-functioning urban environment result as under Sections 19(d)(iii) & (vii) of the Covid Act.</p> <p>The transport memo provided with the Application states public transport and active modes are at the heart of the development philosophy, however, Auckland Transport does not have any funds allocated for bus services in the east of Drury Central train station prior to start of Financial Year 2027 (1st July 2027). The Application describes the development as transit orientated, however, this cannot be the case when there is no public transport in place (the earliest the train station would open is 2025, the earliest dwelling occupation is indicated as 2024) and the distance to the station is greater than 800m (which is beyond what can be considered a walkable catchment). This will result in a car-dependent development.</p> <p>Auckland Transport also has concerns with the implications of the Project as an asset owner. There is a lack of mitigation proposed to address construction traffic effects on both the capacity and condition of existing roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will require pavement rehabilitation upgrade from the outset in order to safely and effectively accommodate the increased construction related traffic. This has not been considered or addressed by the applicant.</p> <p>The site is located within the Future Urban zone under the AUP(OP) where development should not be compromised by premature subdivision, use or development. The Drury-Opāheke Structure Plan clearly states land development and infrastructure delivery should be highly coordinated. Any misalignment between development and the required transport infrastructure being in place will not result in a well-functioning urban environment contrary to the NPS UD and failing to achieve the purpose of the Covid Act.</p>
[Insert specific requests for comment]	Click or tap here to insert responses to any specific matters the Minister is seeking your views on.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Auckland Transport
Contact person (if follow-up is required)	Tessa Craig – Major Developments Interface Lead, Planning and Investment
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Waihoehoe Precinct (“Project” or “Application”)
General comment	<p>Auckland Transport does not support the Project being accepted for fast track consenting. The Waihoehoe Precinct is already subject to a private plan change process (PPC 50) under the Resource Management Act 1991 (RMA) with a hearing commencing in August. It is considered more appropriate for the Project to proceed through existing RMA private plan change processes rather than the COVID-19 Recovery (Fast-track Consenting) Act 2020 (Covid Act). The development will not help achieve the purpose of the Covid Act as a well-functioning environment (s19(d)(iii)) will not be achieved due to the misalignment between the delivery of the minimum necessary infrastructure and services ahead of the first dwellings being occupied (indicated as 2023). The project does not align with the Auckland Unitary Plan (Operative in Part) (AUP(OP)), the Drury-Opāheke Structure Plan or the National Policy Statement on Urban Development 2020 (NPS UD). There is a significant infrastructure funding shortfall which is unable to be resolved in the fast track time frames laid out by the developer.</p>
Other considerations	<p>The AUP(OP) states that Future Urban zoned land should not be developed for urban purposes until it has been through a plan change process (refer Objective H18.2(1) of AUP(OP)). The Auckland Plan and Future Urban Land Supply Strategy (FULSS) provide the Development Strategy for Auckland, including the sequencing and timing for when future urban areas will be ready for development to commence, which requires necessary underpinning zoning and bulk infrastructure to be in place.</p> <p>The Drury – Opāheke Structure Plan sets out the 30-year vision for the area and includes a well-connected transport network, with land development and infrastructure delivered in a highly coordinated manner. Infrastructure investment and implementation plans are key to enabling this vision. It is considered more appropriate for the Project to proceed through the existing RMA private plan change processes which are already progressing, and (if PPC 50 is approved) subsequent consent processes.</p> <p>Auckland Council and Auckland Transport submissions on PPC 50 (and other significant private plan changes in the area, two of which are similarly subject to proposals for referral under the Covid Act: PPC 48 (Drury Centre) and PPC 49 (Drury East)) identify that:</p> <ul style="list-style-type: none"> the development projects are out of sequence with the Auckland Plan Development Strategy and FULSS; there is insufficient infrastructure to support the applications and significant infrastructure spend is required to support the projects for which there is no approved/agreed funding or financing to address;

- there will be a significant impact on Auckland Council / CCO and/or third-party infrastructure;
- there is the potential for significant adverse environmental effects to occur.

Strategic transport infrastructure is needed to service the whole growth area as identified in FULSS and identified by Supporting Growth Alliance (a partnership of Auckland Transport and Waka Kotahi). The FULSS informs the Auckland Plan Development Strategy, the spatial plan for Auckland as per the Local Government (Auckland Council) Amendment Act 2010. The FULSS and Development Strategy helps to inform wider network infrastructure asset planning and funding priorities and, in turn, enable development capacity to be identified in a coordinated and cost-efficient way. Any misalignment between the timing of infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is “development ready”.

Auckland Transport does not have funding identified in the RLTP to meet the shortfall in required infrastructure needed to support such development, nor is there any delivery agreement with developers. The applicant has stated that diversion of existing public transport services or a provision of additional shuttle services (presumably to the proposed Drury Central train station) could be provided at the initial stage of development, although who would fund this is not known. There are no Auckland Transport funds allocated for bus services in the east of Drury Central train station prior to start of Financial Year 2027 (1st July 2027) and any funds are predicated on the delivery of the rail station. Therefore, there is a risk that the development will not receive the appropriate infrastructure required for a well-functioning urban environment nor the level of multi-modal accessibility anticipated by the applicant (and included in the assumptions for the developments). Frequent, reliable and attractive public transport options are a key outcome identified in the Drury – Opāheke Structure Plan (3.1.2.3(b)).

The timeline provided by the applicant shows that the first dwellings would be ready for occupation at the start of 2023. The Drury Central train station will not be delivered until 2025 at the earliest. The other New Zealand Upgrade Programme (NZUP) projects (including Mill Road) are undergoing a 're-baselining', to better understand the cost and strategic objectives of these major investments. This work may result in changes to the scope, cost and timing of these projects. In addition, as addressed above, no funding has been allocated for public transport services in Drury until after the train station opens. Upgrades to the existing network to support active modes are also unfunded. The lack of complementary supporting infrastructure will put pressure on existing site access points, put modal aspirations at risk, and will result in increased carbon emissions. This results in a compromised urban form and is not conducive to Transit Orientated Development. Given these issues, the existing plan change process under the RMA, with the full participation of Auckland Council and infrastructure providers such as Auckland Transport, is the appropriate process to consider *inter alia* timing and infrastructure triggers for development.

The Application proposes interim upgrades to Waihoehoe Road and an interim safety upgrade to the Great South Road / Waihoehoe Road intersection. The north-south Opaheke Road will be provided by the applicant, along with an 'interim' signalised intersection where the Opaheke Road meets Waihoehoe Road. However, there are additional upgrades Auckland Transport has identified that need to be in place prior to any subdivision, new dwellings, retail or commercial development. The interim measures proposed by the applicant do not meet Auckland Transport standards, and as such, put vulnerable users at risk which will affect modal aspirations and will not align with a Vision Zero approach (this approach aligns with the Governments' Road to Zero Strategy 2020-2030). The discrepancies between what the developer proposes to provide and what Auckland Transport considers to be necessary and in place ahead of any development include:

- The interim road upgrade of Waihoehoe Road will only be provided within the existing 20m wide corridor and will not meet the minimum standard for an arterial road (no provision for back berms and reduced front berms resulting in safety effects and challenges with utilities provision). To achieve an arterial road standard, third party land would be required (a minimum of 1.6m) to achieve all necessary roading elements;
- The interim reconstruction of Waihoehoe Road / Great South Road intersection includes zebra crossings over two lanes on two of the arms of the roundabout. This is not a safe outcome as vehicles on the inner lane might not see pedestrians and therefore the upgrade would not adequately mitigate effects. Auckland Transport has identified the need for a dual lane roundabout at this intersection;
- Waihoehoe Road includes an overbridge into the existing Drury centre where the Drury school, a pre-school and several other local amenities including post office, dentist and food stores are

	<p>located. The existing bridge does not adequately provide for active modes and needs upgrading as part of the Waihoehoe Road improvements. This is not proposed as part of the Project.</p> <p>Allowing the site to be developed ahead of the infrastructure required to support sustainable development will not cultivate the less car dependent lifestyle which is considered essential for future development in Drury, nor will a well-functioning urban environment result as under Sections 19(d)(iii) & (vii) of the Covid Act.</p> <p>The transport memo provided with the Application states public transport and active modes are at the heart of the development philosophy, however, Auckland Transport does not have any funds allocated for bus services in the east of Drury Central station prior to start of FY 2027 (1st July 2027). The northern part of the development is more than 800m from the proposed Drury Central train station. This is beyond what can be considered a walkable distance. The Application describes the development as transit orientated, however, this cannot be the case when there is no public transport in place (the earliest the train station would open is 2025, the earliest dwelling occupation is indicated as 2023) and the distance to the station for some dwellings is greater than 800m(which is beyond what can be considered a walkable catchment).</p> <p>Auckland Transport also has concerns with the implications of the Application as an asset owner. There is a lack of mitigation proposed to address construction traffic effects on both the capacity and condition of existing roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will require pavement rehabilitation upgrade from the outset in order to safely and effectively accommodate the increased construction related traffic. This has not been considered or addressed by the applicant.</p> <p>The site is located within the Future Urban zone under the AUP(OP) where development should not be compromised by premature subdivision, use or development. The Drury-Opāheke Structure Plan clearly states land development and infrastructure delivery should be highly coordinated. Any mis-alignment between development and the required transport infrastructure being in place will not result in a well-functioning urban environment contrary to the NPS UD and failing to achieve the purpose (s19(d)(iii)) of the Covid Act.</p>
[Insert specific requests for comment]	Click or tap here to insert responses to any specific matters the Minister is seeking your views on.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Firstgas Group ("Firstgas")
Contact person (if follow-up is required)	Zane Wood – Senior Land and Planning Officer
	Click or tap here to enter text.
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Drury East Stage 1 Project
General comment	Broadly we oppose this type of urban development being managed through a Fast-Track Process.
Other considerations	Firstgas is involved with Plan Change 49 (PC49) which has been submitted to Auckland Council and is currently in process. The area proposed to be considered through this Fast-Track application sits within the larger rural environment being considered for urban intensification in PC49. I am concerned that permitting a portion of a larger area, that is currently being considered through a Plan Change process, to be brought forward and developed separately may undermine the authenticity and in turn the outcomes of the PC49 process.
[Insert specific requests for comment]	As per the above; <i>"It would be more appropriate for the proposed project, or part of the project, to go through standard consenting or designation processes under the RMA"</i> . Although Firstgas do not look to hinder urban development, as Designation holders in the Fast-Track area we feel a traditional, measured planning approach to the development of this area is more appropriate.

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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

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Organisation providing comment	Transpower New Zealand Limited
Contact person (if follow-up is required)	Jo Mooar
	Senior Corporate Counsel
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Drury Centre (Project)
General comment	<p>Transpower has been identified as an “other person” for the purpose of section 21(3) of the COVID-19 Recovery (Fast Track Consenting) Act 2020 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on the National Grid.</p> <p>Transpower supports the application to become a referred project (Application), given the section 19 public benefits articulated in the Application.</p> <p>The Project area is traversed by two National Grid transmission lines:</p> <ul style="list-style-type: none">• The 220 kV Huntly-Otahuhu A line;• The 110 kV Bombay-Otahuhu A line. <p>These lines play a significant role in relation to the security of electricity supply to Auckland and Northland, and the South Auckland area respectively.</p> <p>The Application identifies the corridor around the National Grid contained in the Auckland Unitary Plan. It says that no development will occur in the National Grid Yard (page 22). However, the Application does not identify the rules that protect the Grid from inappropriate activities in that corridor (contained in Overlay D26). These rules are required to give effect to the National Policy Statement on Electricity Transmission. These rules extend beyond the National Grid Yard – to an area that equates to the maximum swing of the conductor (wires). The rules relate to subdivision and land use activities within the wider corridor.</p> <p>The applicant has recently provided Transpower with draft concept plans for the Project. These plans show greater detail than in the Application, including proposed roads and road infrastructure, buildings, and fences/noise barriers under, or in very close proximity to, the National Grid lines. These draft concept plans show potential conflict between the Project and the National Grid lines (drawing references RC000-925 all-inclusive (58 total drawings), marked ‘work in progress’ dated 10/05/2021). Based on the information provided, the Project would not meet the safe separation</p>

	<p>distances in NZECP34, a mandatory code of practice under the Electricity Act. The draft concept plans also indicate that access to the Grid structures may also be prevented by the Project. Access is required to ensure the Grid can be safely maintained and future works carried out</p> <p>The Project would need to alter its design to avoid these conflicts or require relocation or alteration to the National Grid to ensure NZECP 34 compliance, operability and maintainability. Any necessary alteration or relocation of National Grid assets may require resource consents, and time to obtain those consents.</p> <p>Provided the Project alters its design to avoid these conflicts with the National Grid, and safely manages construction activities in proximity to the National Grid, it would not be inconsistent with policy 10 (in particular) of the National Policy Statement on Electricity Transmission. Nor would it be contrary to NZECP34.</p> <p>Transpower would expect any resource consent applications referred to the expert panel would set out how these conflicts are to be resolved, and the Grid not put at risk. Engineering input would be required by both the applicant and Transpower's engineers. It is likely that detailed consent conditions would need to be imposed.</p> <p>We do not consider that these outstanding issues are a reason to decline the application for the Project to be referred to an expert panel.</p> <p>Transpower does not object to these comments being released.</p>
Other considerations	See above
[Insert specific requests for comment]	N/A

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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Waka Kotahi
Contact person (if follow-up is required)	Evan Keating
	s 9(2)(a)
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Drury Centre – Kiwi Property Holdings No 2 Limited
General comment	While the overall concept of the development proposed by the applicant in the Drury area is supported, the proposal to fast track this consent ahead of the current RMA plan change process which addresses the underlying zoning is not supported. The timing is out of sequence. This is primarily because if the proposal is approved under the fast-track process, it may limit the usual ability to reach a good integrated transport and land use solution by introducing an element of predetermination
Other considerations	<p>The subject land is not currently zoned for the substantial development proposed. The future zoning of the land is presently being decided through a public process under the RMA, with a hearing scheduled for July. Aspects of the development such as the proposed land use (e.g. the extent and location of large format retail) and transport connections are subject to that decision-making process with Waka Kotahi and other parties to provide evidence on these points.</p> <p>Other matters which are to be decided through the plan change process include the nature and timing of transport infrastructure upgrades to support the wider development and two other [Waihoehoe Precinct and Drury East] plan changes. These are currently subject to discussions between the applicants, Waka Kotahi, Auckland Transport and Auckland Council with the intention to form a comprehensive picture of all upgrades required and a funding mechanism supported by planning provisions in the Auckland Unitary Plan. Allowing this development and its associated mitigation to go through a separate process provides a significant risk to the current RMA process which seeks to achieve transport and land-use integration This development needs to deliver a Transit Orientated Development, as suggested by the applicant and supported by Waka Kotahi. If this proposal is approved, it will undermine confidence in the plan change process and would effectively pre-determine its outcome. This could negatively affect the potential to deliver this.</p>
[Insert specific requests for comment]	Click or tap here to insert responses to any specific matters the Minister is seeking your views on.

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Organisation providing comment	Waka Kotahi
Contact person (if follow-up is required)	Evan Keating
	s 9(2)(a)
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Drury East – Stage 1 – Fulton Hogan Land Development Limited
General comment	While the overall concept of the development proposed by the applicant in the Drury area is supported, the proposal to fast track this consent ahead of the current RMA plan change process which addresses the underlying zoning is not supported. The timing is out of sequence. This is primarily because if the proposal is approved under the fast-track process, it may limit the usual ability to reach a good integrated transport and land use solution by introducing an element of predetermination
Other considerations	<p>The subject land is not currently zoned for the substantial development proposed. The future zoning of the land is presently being decided through a public process under the RMA with a hearing scheduled for August.</p> <p>Matters which are to be decided through the plan change process include the nature and timing of transport infrastructure upgrades to support the wider development and in conjunction with the two other [Waihoehoe Precinct and Drury Centre] plan changes. These are currently subject to discussions between the applicants, Waka Kotahi, Auckland Transport and Auckland Council with the intention to form a comprehensive picture of all upgrades required and a funding mechanism supported by planning provisions in the Auckland Unitary Plan. Allowing this development and its associated mitigation to go through a separate process provides a significant risk to the current RMA process which seeks to achieve transport and land-use integration.</p>
[Insert specific requests for comment]	Click or tap here to insert responses to any specific matters the Minister is seeking your views on.

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Organisation providing comment	Waka Kotahi
Contact person (if follow-up is required)	Evan Keating
	s 9(2)(a)
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Waihoehoe Precinct – Oyster Capital Limited
General comment	While the overall concept of the development proposed by the applicant in the Drury area is supported, the proposal to fast track this consent ahead of the current RMA plan change process which addresses the underlying zoning is not supported. The timing is out of sequence. This is primarily because if the proposal is approved under the fast-track process, it may limit the usual ability to reach a good integrated transport and land use solution by introducing an element of predetermination
Other considerations	<p>The subject land is not currently zoned for the substantial development proposed. The future zoning of the land is presently being decided through a public process under the RMA with a hearing scheduled for August.</p> <p>Matters which are to be decided through the plan change process include the nature and timing of transport infrastructure upgrades to support the wider development and in conjunction with the two other [Drury East and Drury Centre] plan changes. These are currently subject to discussions between the applicants, Waka Kotahi, Auckland Transport and Auckland Council with the intention to form a comprehensive picture of all upgrades required and a funding mechanism supported by planning provisions in the Auckland Unitary Plan. Allowing this development and its associated mitigation to go through a separate process provides a significant risk to the current RMA process which seeks to achieve transport and land-use integration.</p>
[Insert specific requests for comment]	Click or tap here to insert responses to any specific matters the Minister is seeking your views on.

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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Watercare Services Limited
Contact person (if follow-up is required)	<div>s 9(2)(a) Head of Major Development, Watercare</div> <div>Click or tap here to enter text.</div> <div>Click or tap here to enter text.</div>

Comment form

Please use the table below to comment on the application.

Project name	Drury Centre, Drury East Stage 1 and Waihoehoe Precinct
General comment	Watercare does not support or oppose the applications. We confirm that the initial stages of each application can be serviced by the transmission water and wastewater networks. Significant upgrades to the transmission network will be required to support full build out of the proposed developments. The timing and funding for these upgrades is not known at the present time. As the area is a greenfield, all local water and wastewater network will need to be designed, constructed and fully funded by the developers.
Other considerations	<p>1. Background to all Proposals</p> <p>Watercare has recently constructed transmission water and wastewater infrastructure in this area to service the Drury South Limited development at Quarry Road. This infrastructure has been upsized to enable the initial stages of the Drury Centre (Kiwi Property) development, the Drury East (Fulton Hogan) development and Waihoehoe (Oyster Capital) development. However, significant water and wastewater upgrades will be required to support the proposed full build-out of these developments and the wider Drury East area.</p> <p>This area falls within the area serviced by Veolia water. In this area, Watercare is responsible for the operation and planning of the water supply and wastewater transmission networks. Veolia is responsible for operating and maintaining the local water and wastewater network in their area of service.</p> <p>2. Comments on Each Proposal</p> <p>A. Drury Centre (Kiwi Property)</p> <p>The proposal for a mixed-use development located at Kiwi Property site at 1139, 155, 173 and 189 Fitzgerald Road; 61 Brookfield Road; and 108, 116, 120, 124, 132 Flanagan Road Drury, includes:</p> <ul style="list-style-type: none">• A total of six superlots for large format retail (LFR) amounting to 45,200m² GFA is proposed on the western portion of the site and surrounding the ancillary car parking areas for this retail space, and• A total of 13 superlots totalling 7.597ha of land for residential development, which will enable the construction of 400-600 dwellings, is planned to the east of the LFR.

No water and wastewater flow or water supply demand data were provided as part of this application.

Watercare confirms that the initial stages of the Drury Centre development can be serviced by the Watercare transmission network. All local water and wastewater network will need to be designed, constructed and funded by the developer.

Water Supply:

A new Bulk Water Supply Point (BSP) has been constructed at Flanagan Road adjacent to the Waikato Water Pump Station. This BSP has enough flow and pressure to service the proposed development. There is a new Ø450 local watermain that runs from Flanagan Road BSP along Waihoehoe Road and down Fitzgerald Road.

The developer shall design and construct a local water supply reticulation to connect from this BSP/local watermain to enable all sites within the development area to be supplied with potable water for domestic, commercial and firefighting purposes.

The construction of the local reticulated water supply network to service the development area shall be progressively developed to a fully networked distribution system with ring mains and multiple interconnections to ensure resilience and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Wastewater:

Watercare has installed the Southern Wastewater Network. This network has been installed to service the Drury South development but has been upsized to cater for some additional development. The Southern Wastewater Network includes the new Drury South Pump station and a rising main to connect the network into the Bremer road wastewater transmission main. The Drury South Pump station has a capacity to service 10,000 dwellings. It also includes a gravity wastewater main from the intersection of Brookfield and Fitzgerald Road.

The newly constructed infrastructure can accommodate the initial stages of the Drury Centre development. Beyond this, the infrastructure will need to be significantly upgraded. The timing and funding for this upgrade are not currently confirmed and will be subject to funding availability.

The extent of development proposed by Kiwi Property can be serviced by establishing a local network connecting to Watercare's transmission wastewater network.

The construction of the local wastewater network to service the development area shall be progressively developed to a fully networked distribution system and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

B. Drury East (Fulton Hogan)

The first stage of the proposed development located at Drury East site at 86 and 94 Fitzgerald Road, 251 and 383 Waihoehoe Road, 65, 76 and 108 Fielding Road, Drury, includes:

- Up to 248 new residential units over 9.65ha of land, and

- 28 superlots totalling approximately 4.84ha of land, which will enable approximately 345 new residential units.

No water and wastewater flow or water supply demand data were provided as part of this application.

Watercare confirms that the initial stages of the Drury East development can be serviced by the Watercare transmission network. All local water and wastewater network will need to be designed, constructed and funded by the developer.

Water Supply:

A new Bulk Water Supply Point (BSP) has been constructed at Flanagan Road adjacent to the Waikato Water Pump Station. This BSP has enough flow and pressure to service this proposed development by Fulton Hogan. There is a new Ø450 local watermain that runs from Flanagan Road BSP along Waihoehoe Road and down Fitzgerald Road.

The developer is required to construct a 450mm water main along Waihoehoe Road to service the development and create a ring main to connect to the existing water main in Fitzgerald Road. This is to be fully funded by the development but may be subject to cost-share arrangements with the other developers.

The construction of the local reticulated water supply network to service the development area shall be progressively developed to a fully networked distribution system with ring mains and multiple interconnections to ensure resilience and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Wastewater:

Watercare has constructed the Southern Wastewater Network. This network can provide sufficient capacity for the first stage of the development. Beyond that, the wastewater network will need to be significantly upgraded. The timing for this is not confirmed and will be subject to funding availability.

The extent of development proposed by Fulton Hogan can be serviced by establishing local gravity reticulation connecting to Watercare's new transmission wastewater network.

The construction of the local reticulated wastewater network to service the development area shall be progressively developed to a fully networked distribution system and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

C. Waihoehoe (Oyster Capital)

The proposed development located at Oyster Capital site at 76, 76A and 116, 136 and 140 Waihoehoe Road, Drury, includes:

- Up to 376 new residential units comprised of standalone and terrace housing in a variety of sizes and designs
- 9 superlots totalling 7.2 hectares of land for residential development, which will enable the development of approximately 270 dwellings on the western portion of the site.

No water and wastewater flow or water supply demand data were provided as part of this application.

There is currently no public water or wastewater local network reticulation available to service this Oyster Capital development area.

Watercare confirms that the initial stages of the development can be serviced with the necessary infrastructure to be designed and constructed by the developer.

Water Supply:

A new Bulk Water Supply Point (BSP) has been constructed at Flanagan Road adjacent to the Waikato Water Pump Station. This BSP has enough flow and pressure to service this proposed development by Oyster Capital. There is a new Ø450 local watermain that runs from Flanagan Road BSP along Waihoehoe Road and down Fitzgerald Road. A new 450mm water main will need to be extended down Waihoehoe Road.

The developer shall design and construct a local water supply reticulation to connect from this BSP/local watermain to enable all sites within the development area to be supplied with potable water for domestic, commercial and firefighting purposes.

The construction of the local reticulated water supply network to service the development area shall be progressively developed to a fully networked distribution system with ring mains and multiple interconnections to ensure resilience and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

Wastewater:

While this development will in the future need to connect into the Opaheke wastewater catchment, that area is still Future Urban Land. Therefore, Watercare has agreed that this development can initially connect into the Drury South catchment. Beyond that, significant wastewater upgrades will be required. The timing of this is not known, as it will depend on funding availability.

The extent of development proposed by Oyster Capital can be serviced by establishing local gravity reticulation connecting to Watercare's new transmission wastewater main.

The construction of the local reticulated wastewater network to service the development area shall be progressively developed to a fully networked distribution system and is to be fully funded and constructed by the developer in accordance with the current Watercare Water and Wastewater Code of Practice for Land Development and Subdivision (Code of Practice).

[Insert specific requests for comment]

[Click or tap here to insert responses to any specific matters the Minister is seeking your views on.](#)

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