

Drury Metropolitan Centre Fast-track

Auckland Council Specialist Memo

**Annexure 9:
Parks Planning
Lea van Heerden
11 August 2025**

Parks Planning Memo

Prepared by: Lea van Heerden, Senior Parks Planner, Auckland Council

Approved by: Hester Gerber, Manager Parks Planning

Date: 11 August 2025

Qualifications and Relevant Experience

I hold the qualification(s) of Bachelor's (Honours) in Town and Regional Planning and have 10 + years of experience in resource consents, transport planning and open space planning. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.

Code of Conduct

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code 9, specifically 9.3**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

1. INTRODUCTION

1.1 This memorandum provides Parks and Communities comments on the open space, formal, passive and recreation aspects of the Sunfield fast-track approval application (**Application**).

1.2 It is structured as follows:

(a) Introduction

a. Executive summary

b. Documents reviewed

c. Site visit

(b) Regulatory and Strategic Context

(c) Technical Assessment: Key Constraints and Open Space Usability based on Applicant's Proposal

(d) Strategic Network Evaluation and Policy Fit – Parks and Community Facilities Strategic Assessment and Recommendations

(e) Proposed conditions.

Executive Summary

1.3 The Application proposes a network of publicly accessible open spaces within the Drury

Metropolitan Centre Stage 2 area, comprising Valley Park, the Hingaia Stream Reserve, and Stream A riparian corridors. These spaces are designed to deliver a range of recreational, amenity, drainage and ecological benefits.

- 1.4 Valley Park, as the central feature, incorporates a stormwater basin (Wetland 2-1), extensive vegetation, a hardscaped promenade, and terraced landforms. It is designed to integrate with adjacent plaza spaces on Lots G and E, as well as a shared space/pedestrianised segment of Road 11.
- 1.5 Valley Park is intended to remain in private fee simple ownership and be maintained by Kiwi Property, while functioning as a publicly accessible civic and recreational space. Although privately owned, publicly accessible open spaces can provide recreational outcomes, they will not provide opportunities to deliver on community infrastructure that is often co-located on open spaces vested in the Council. In contrast, the Hingaia Stream Reserve is proposed to be vested in Auckland Council as an esplanade reserve, securing long-term public access and Council management. The riparian corridors along Stream A are also proposed to be vested in Auckland Council as local purpose drainage reserves, with riparian planting protected and maintained in perpetuity through appropriate legal mechanisms.
- 1.6 This advice provides a technical and strategic assessment of the proposed open space and recreation network for the Drury Metropolitan Centre Fast-track Approval Application. While the application includes publicly accessible open spaces, such as Valley Park, Hingaia Stream Reserve, and Stream A riparian corridors, the proposal does not yet meet Auckland Council's expectations for delivering a coherent, policy-aligned, and functionally distributed formal recreation open space, resulting in significant adverse effects on the provision of structured community infrastructure within the Metropolitan Centre suitable for a high-density metropolitan environment. This limits the ability of future residents to access structured recreational spaces locally, increasing reliance on already-constrained parks and weakening local community infrastructure delivery.
- 1.7 The land subject to the application is zoned Business – Metropolitan Centre, Business – Mixed Use, and Open Space – Informal Recreation under the Auckland Unitary Plan (Operative in Part), and is subject to the Drury Centre Precinct provisions, recently approved. These provisions anticipate high-density residential, commercial, and civic outcomes supported by integrated public infrastructure, including formal open space. The current proposal does not provide sufficient land or design certainty to support these outcomes from a parks and open space perspective.
- 1.8 However, a specialist review by Auckland Council's Open Space Provision Specialist team (dated 6 June 2025) identifies inconsistencies with Council policy and provision expectations, particularly around the role, extent, and delivery of formal open space in the form of a neighbourhood park and adequate civic space.
- 1.9 Although the applicant proposes privately owned community facilities, civic space and amenity elements within the development, these are located on land that is privately owned and primarily functions as part of the stormwater management network. This approach raises several concerns from a parks and open space planning perspective, as the land is not secured for public use, the size of the civic space and stormwater function limits its reliability as fit-for-purpose recreational infrastructure. The key significant adverse effects associated with this approach include:

- Unsecured public access: Without a formal easement or vesting arrangement, there is no legal guarantee that public access will be maintained in perpetuity. This creates long-term uncertainty regarding community benefit and use.
 - Dual-use conflicts: Land designed primarily for stormwater management may be subject to periods of inundation or restricted access during maintenance or weather events. This undermines its ability to support consistent, safe, and year-round recreation.
 - Perception of public space: The physical form and design of these areas, especially if they include promenades, play nodes, or shared paths, may lead to public misperception that they are part of the formal public open space network. This creates a reputational and operational risk for Council, as the public may expect the same level of service, safety, and maintenance as in vested parks, despite the land being privately owned and managed.
 - Limitations on formal recreation delivery: Land not classified or secured as recreation reserve cannot be relied upon to accommodate social infrastructure typically associated with neighbourhood parks in metropolitan environments (e.g. courts, clubrooms, public toilets, playgrounds). This limits Council's ability to plan and deliver adaptable, multi-generational assets aligned with long-term community needs.
- 1.10 The Auckland Open Space, Sport and Recreation Strategy was formally adopted by Auckland Council's Planning and Environment Committee on 15 May 2025, consolidating five previous strategies into a single, unified roadmap for the delivery of open space, sport, and recreation across the region. The Strategy seeks to ensure equitable access to quality open spaces that promote the wellbeing of people, land, water, and whānau throughout Tāmaki Makaurau. It is structured around five strategic directions, including "Make all of Tāmaki Makaurau our backyard" and "Enhance our response to climate disruption".
- 1.11 It is guided by four investment principles that promote benefits-led, evidence-based, equitable, and collaborative decision-making. Its three core policies, particularly "Making the most of our open spaces," set clear expectations for the delivery of purpose-designed, functional recreation spaces. Critically, the Strategy distinguishes between stormwater infrastructure and public recreation land, affirming that only flood-free, publicly vested, and accessible areas qualify as formal neighbourhood parks. It also highlights the need for open spaces to be safe, climate-resilient, usable year-round, and located within a 400-metre walk of all dwellings to ensure long-term community benefit and equity.
- 1.12 While the proposed open space network includes accessible areas with positive amenity and ecological outcomes, these constraints collectively reduce its ability to deliver reliable, enduring, and equitable recreational services, particularly within a high-density urban centre where local open space is critical to wellbeing and social infrastructure delivery. Formal recreation encompasses a broad range of structured, community-serving uses, extending beyond play equipment or sports fields, and includes facilities such as clubrooms, libraries, and community buildings, typically delivered through the parks and open space network.
- 1.13 Key concerns relate to the lack of flood-free, vested neighbourhood park, the undersized and constrained civic space, and the over-reliance on drainage reserves and privately owned land to deliver formal public recreation outcomes. Although a 7,000m² park has been approved under Stage 1 (RC BUN60414877, SUB60414913), it is proposed to remain in private ownership, and its catchment does not extend sufficiently into Stage 2. No new formal recreation reserves are proposed within Stage 2.

- 1.14 A strategic network assessment confirms that the Drury Centre is surrounded by constrained or inaccessible open spaces, due to the presence of arterial roads, the SH1 corridor, the rail line, and floodplain areas. Most nearby parks either do not function as neighbourhood parks or remain unvested and unfunded, further underscoring the need for an internal formal open space solution.
- 1.15 To address this gap, Council recommends the inclusion of an additional flood-free neighbourhood park within Stage 2, at a minimum size of 3,000m² in the area of Stage 2.6.2 within the northwestern corner of Lot 36, between Lot 500 (road) and Lot 512 (Road). This park should be strategically located to leverage the connectivity benefits of the north-south Stream A corridor and the adjacent 2.6 ha drainage reserve, while enhancing linkages with the proposed civic space and future east-west movement corridors.
- 1.16 This recommendation aligns with the outcome envisaged by the Drury Centre Precinct Plan and the logic of open space distribution. It will improve network equity, accessibility, and the vision to serve Auckland with the open space needed as captured in the Manaaki Tāmaki Makaurau – Auckland Open Space, Sport and Recreation Strategy (2025).
- 1.17 In summary, the lack of a secured, flood-free, and publicly accessible formal recreation reserve in Stage 2 is likely to result in significant long-term gaps in recreation access, placing pressure on existing parks and limiting the community's ability to engage in structured, localised recreational activity. This may lead to reduced social cohesion, inequitable access to amenities, and a network that does not adequately support the intensification anticipated under the Metropolitan Centre zoning. Without refinement, the open space network risks being fragmented, inaccessible, and unable to meet the formal recreation needs of a growing population.
- 1.18 The key recommendations arising from the assessment outlined in this memorandum are summarised in **Section 4** below. Comments on the Applicant's proposed conditions are provided in **Section 5** and **Appendix A**.

Documents Reviewed

- 1.19 The following documents have been reviewed in preparing this memorandum:
- "AEE Drury Metropolitan Centre Stages 1 and 2_Fast-track AEE_Final.pdf"
 - "Appendix 5 Proposed Draft Consent Conditions.pdf"
 - "Appendix 6 Architectural Drawings (Parts 1–4).pdf"
 - "Appendix 7 Landscape Design Report.pdf"
 - "Appendix 8 Subdivision Scheme Plans.pdf"
 - "Appendix 9 Engineering Drawings (Parts 1–3).pdf"
 - "Appendix 14 Urban Design Assessment.pdf"
 - Response s67 further information memorandum recommended by Auckland Council prepared by Barkers and Associates dated 24 July 2025.

Site visit

- 1.20 A site visit was conducted by Council staff on 18 July 2025, accompanied by the applicant's representatives. Although, as the representative for Parks and Community Facilities (Lea van Heerden), I did not attend the site visit, I am familiar with the site and surrounding context through prior involvement in Stage 1 assessments and subsequent ongoing reviews of associated engineering plan approvals.

2. REGULATORY AND STRATEGIC CONTEXT

- 2.1 The proposed development is subject to multiple planning documents that set expectations for open space delivery in Auckland's urban growth areas.
- 2.2 Auckland Unitary Plan (Operative in Part): The subject site is zoned Metropolitan Centre, Business – Mixed Use, and Open Space – Informal Recreation. Development is to occur in accordance with the Drury Centre Precinct provisions, which support high-density, transit-oriented outcomes. From an open space perspective, the proposed development is somewhat aligned with the intended outcome.
- 2.3 Drury Centre Precinct Plan: The Drury Centre Precinct Plan, made operative through Plan Change 48, establishes the statutory planning framework for this area and gives effect to the Drury-Opaheke Structure Plan. While the Structure Plan provided the initial strategic land use direction, the Precinct Plan now supersedes it as the operative and legally binding planning instrument under the Auckland Unitary Plan, noting that this Plan Change was recently approved.
- 2.4 The Precinct Plan identifies key structural elements, including Valley Park and Homestead Park, as well as supporting road and civic infrastructure. Notably, while Homestead Park is recognised as a neighbourhood park within the Precinct Plan, and the intent was to try and retain elements of it, it is not proposed for delivery under this Application for the following reasons as part of their s67 response:
- Precinct Plan Flexibility: The precinct plan identifies the Homestead Park location as indicative and subject to confirmation through subdivision consent.
 - Stormwater and Ecological Needs: Valley Park was enlarged (to ~2.2 ha) to manage increased stormwater runoff and achieve ecological enhancement for Stream A, exceeding typical neighbourhood park size due to required basin area, riparian buffers, and maintenance access.
 - Connectivity and Urban Layout: The larger Valley Park footprint supports efficient block structure and enables a key north-south pedestrian link between Stage 1 and Drury Central Rail Station, which displaced the original Homestead Park location.
 - Urban Design Priorities: The applicant views Valley Park as a higher-value civic space, integrating stormwater, ecological, and urban design functions with adjacent community facilities, public plazas, and strong passive surveillance, making it a more strategic anchor than Homestead Park.
- 2.5 Given the operative status of Plan Change 48, greater weight must be given to its provisions and mapped outcomes when assessing the effects and adequacy of the proposed open space network.

- 2.6 Drury-Opaheke Structure Plan: The proposal generally aligns with the Drury-Opaheke Structure Plan's intent to manage flood-prone areas through integrated stormwater and open space design. The open space network, including Valley Park, the Hingaia Stream Reserve, and the Stream A riparian corridors, has been intentionally located within the floodplain to enable ecological restoration, stormwater management, and publicly accessible passive recreation.
- 2.7 These areas contribute to the wider open space network anticipated for the Drury Metropolitan Centre by providing connected green corridors, shared paths, and visual amenity within a highly urbanised context. While not all land is proposed to vest in Auckland Council, most notably Valley Park, which will remain privately owned but publicly accessible, the overall layout supports the creation of a passive recreation network. From a parks planning perspective, remaining concerns relate to the clarity of reserve classifications (e.g. recreation vs drainage), long-term recreational use in stormwater-dominated areas, and whether zoning sufficiently reflects the risk and role of flood-prone land as functional open space.
- 2.8 Manaaki Tāmaki Makaurau – Auckland Open Space, Sport and Recreation Strategy (2025): Drury Metropolitan Centre Stage 2 development partially aligns with the expectations set out in Manaaki Tāmaki Makaurau – Auckland Open Space, Sport and Recreation Strategy (2025), particularly in terms of hierarchy and civic function, but presents gaps in terms of formalised open space for active community use.

- **Civic Space (2000–4000m²):** An overall civic space of 800–1,375m² is being proposed. The proposal includes Valley Park, a 2.2-hectare publicly accessible space that integrates pedestrian roads, terracing and a promenade. It is designed to function as a civic focal point, albeit not through traditional means. Although it is not proposed to vest in Council ownership, its design intent and location meet the strategic requirement for a civic space in a metropolitan zone in terms of role. Although limited in size, it does enable integration with plaza spaces and a pedestrianised road, supporting urban form, but not necessarily large public gatherings.
- **Formalised Open Space for Active Community Use:** The proposal lacks a clearly defined and secured formal recreation space (e.g. courts, kickabout areas, or sports fields and social infrastructure associated with formalised recreation) typically expected in metropolitan areas under the strategy. While Valley Park and the riparian corridors support passive recreation and stormwater/ecological outcomes, they are not confirmed to include formal recreation infrastructure.

Community infrastructure, such as playgrounds, courts, seating areas, toilets, shade structures, and associated buildings that support social interaction and active use, is more appropriately delivered within flood-free, formal, and publicly vested parks that can be purpose-designed, maintained, and integrated into the wider open space network. Furthermore, much of the land with open space function is dual-purpose (stormwater + amenity) and not classified as recreation reserve, which raises concerns about usability for formal activities, especially under wet or flood-prone conditions or civic space retained in private ownership.

- **Open Space Hierarchy and Quality:** The network provides a connected system of public and publicly accessible open spaces, including walkways and green corridors along Stream A and the Hingaia Stream. These support quality and accessibility

objectives for passive use and ecological values. However, the lack of clear delineation between drainage reserves and active recreation spaces limits the ability to confirm full alignment with the strategy's hierarchy and quality expectations, particularly at a metropolitan scale.

- 2.9 The proposed landscaping for Drury Metropolitan Centre Stage 2 demonstrates a strong conceptual vision and culturally informed design approach, which aligns with the intent of Chapter 7 of the Code in terms of design quality. The use of native species and large-grade trees is generally supported, though it raises some implementation concerns that are discussed later in this report.
- 2.10 At this stage, the landscape plans remain conceptual and do not yet meet the detailed design and implementation requirements of the Code. Notable gaps include the absence of species quantities, tree pit design, soil depths, and planting methodologies, all of which are critical for ensuring durability and successful establishment to give effect to amenity outcomes such as shading, wayfinding, and reducing surface heat. Most significantly, the documentation lacks a maintenance plan or any written specifications for ongoing management, which is a key requirement under Chapter 7 for assets proposed for public vesting.
- 2.11 While it is accepted that much of this detail will be appropriately resolved through the Engineering Plan Approval (EPA) stage, the absence of clear commitments at the Resource C stage, such as soil volumes and adequate space within the berms, creates uncertainty about long-term viability and compliance. To address this, it is recommended that a condition of consent be included requiring the submission and approval of a detailed landscape maintenance plan at the time of EPA, in accordance with Chapter 7 of the Code. This approach provides certainty at the consent stage while appropriately deferring technical details to the implementation phase.
- 2.12 In summary, while the proposal demonstrates an intent to deliver quality landscape outcomes, it fails to meet the mandatory standards for durability, detailed implementation, and long-term maintenance required under the Auckland Code of Practice. A condition of consent is therefore necessary to secure compliance through subsequent stages and ensure the delivery of fit-for-purpose public assets.
- 2.13 The proposed civic plaza does not meet the spatial or functional requirements of a metropolitan civic space and therefore cannot be considered fit-for-purpose.

3. TECHNICAL ASSESSMENT: KEY CONSTRAINTS AND OPEN SPACE USABILITY BASED ON APPLICANT'S PROPOSAL

- 3.1. This assessment evaluates open space provision and streetscape landscaping for the Drury Metropolitan Centre Fast-track proposal, where reserves and roads are intended to be vested in Auckland Council. It integrates both a technical review, considering land usability, functional resilience, ownership structures, and the impact of stormwater infrastructure on asset performance, and a strategic-level evaluation of formal and passive recreation outcomes in the context of local and regional policy expectations.
- 3.2. The strategic assessment considers how the proposed Drury Metropolitan Centre open space network integrates with surrounding parks, transport corridors in terms of streetscape amenity, and ecological infrastructure the Manaaki Tāmaki Makaurau – Auckland Open

Spaces, Sports and Recreation Strategy (2025). It examines the extent to which the development supports equitable access to high-quality, flood-free, and usable public open space and whether it delivers on the policy aspirations for Metropolitan Centres under the Auckland Unitary Plan.

Reserve Classification and Stormwater Function

- 3.3. *Stormwater Function and Open Space Typology* - The applicant proposes a total of approximately 2.6 hectares of publicly accessible open space within the Stage 2 area. However, a significant portion of this land, particularly Valley Park (Lot 600) and Wetland 2-2 (Lot 603), is designed to accommodate stormwater management functions and will remain in private ownership. Lots 601, 602, and 604 are proposed to vest as local purpose (drainage) reserves, while Lot 610 is proposed to vest as an esplanade reserve. No land within the Stage 2 area is proposed for vesting to Auckland Council as a formal recreation reserve. This represents a substantial gap when assessed against open space typology benchmarks for neighbourhood parks and civic spaces within intensifying urban environments.
- 3.4. *Ambiguity in Reserve Classification and Ownership* - The lack of delineation between stormwater land and recreation land on the scheme plans introduces ambiguity regarding function and long-term governance. The multi-layered purpose of Valley Park, involving stormwater conveyance, ecological restoration, and passive amenity, raises concerns around how these spaces will perform under frequent inundation, and whether they can support durable, accessible, and safe recreational use, including social infrastructure associated with formalised recreation.

Civic and Formal Recreational Space Provision

- 3.5. For the purposes of this assessment, it is important to clarify that formal recreation is not limited to the provision of play equipment or individual sport fields. Auckland Council defines formal recreation more broadly as land and facilities that can support structured, community-serving recreational functions. This includes, but is not limited to, sport fields, play spaces, clubrooms, libraries, community buildings, and other social infrastructure typically delivered through parks and open space networks.
- 3.6. Civic space is a type of open space that provides hardscaped, publicly accessible areas designed for social interaction, gatherings, and civic functions, particularly within urban and metropolitan centres. While it forms part of the broader open space network, it does not replace the need for recreation reserves or green open spaces
- 3.7. *Shortfalls in Civic Space Provision* - The proposal raises a key concern regarding the delivery of a high-quality, publicly-owned civic space and formalised recreation. The proposed civic plaza, estimated at 800–1,375m², falls well below the Auckland Council metropolitan centre benchmark of 2,000–4,000m². Its triangular layout, proximity to vehicle access and parking areas, and limited spatial integration with the urban core further reduce its effectiveness as a vibrant civic destination, known in the traditional sense of a large area that can accommodate larger community gatherings. This shortfall reduces the site's capacity to accommodate larger public events and civic gatherings, undermining its role as a social and cultural anchor for the centre.

- 3.8. Homestead Park, a key structured recreation reserve identified in the Drury Centre Precinct Plan, is notably absent from this application. The intent was to retain some aspects of the homestead. Its exclusion removes an opportunity to provide formal recreational infrastructure proximate to the town centre and public transport interchange, an essential element of the precinct's planning framework. Its exclusion removes a key opportunity to integrate formal recreation within the walkable core of the centre, thereby reducing accessibility to essential community infrastructure, such as courts, clubrooms, swimming pools, or play spaces.
- 3.9. Instead, the proposal relies on Road 11, Lots G and E and Valley Park (Lots 600 and 609) to fulfil civic and recreational functions. While Valley Park spans approximately 2.2 hectares and incorporates stormwater treatment (Wetland 2-1), daylighted Stream A, promenades, terracing, and boardwalks, it is proposed as privately owned fee simple land, to be maintained by Kiwi Property.
- 3.10. *Legal Uncertainty and Public Access Risk* - Although the design enables public access and passive surveillance through integrated pedestrianised frontages and plaza connections (including Lots G and E), the applicant has not identified a formal legal mechanism (e.g. public access easement or covenant) to guarantee public access in perpetuity. This lack of formalised public access over such a critical space undermines its long-term function as a civic asset and raises concerns about enduring community benefit, enjoyment and use. Without secure public access, there is a risk that community use of key civic spaces may be restricted or revoked, undermining long-term public benefit and certainty.

Adverse effects of inadequate formal recreation

- 3.11. *Effect on Council's Community Infrastructure Delivery* - In the absence of a flood-free, publicly vested neighbourhood park, the proposed open space network fails to provide the foundational infrastructure required for structured recreation and social infrastructure typically expected in high-density civic environments, such as clubrooms, courts, or playgrounds etc. It represents a significant adverse effect on the delivery of community-serving open space infrastructure for the Drury Metropolitan Centre. Without formalised parks, there is no secure land available to accommodate assets such as playgrounds, courts, clubrooms, or other social infrastructure typically associated with neighbourhood parks in metropolitan environments.
- 3.12. Without securing public land, the Council cannot deliver adaptable, multi-generational facilities, resulting in missed opportunities to build community wellbeing, promote social interaction, and support youth engagement. There is no guarantee that communities will have uninterrupted access to safe, year-round parks within walking distance, and will be forced to rely on distant or inaccessible parks, many of which are separated by physical barriers or not yet delivered.
- 3.13. *Privately Owned Open Spaces and Their Limitations* - While the applicant proposes a network of private open spaces, these areas cannot be considered part of the local public open space network, as they fall outside Council ownership and control, and cannot be relied upon to meet service-level requirements for recreational provision or community infrastructure. It represents a significant open space deficiency for the Drury Metropolitan Centre and is not aligned with expected outcomes for high-density areas.

Streetscape landscaping and specie selection and reserve landscaping

Streetscape Landscaping

- 3.14. The application proposes to vest several roads with Auckland Council, including Road 25 and Road 2 North, both identified as Collector Roads with 23m-wide corridors intended to support active transport and wider network integration. Additional roads proposed for vesting include Lots 506, 510, 511, 512, and 517 across Stages 2.1 to 2.4.3, all designed to Auckland Transport standards. By contrast, key roads such as Hotiki Road (Road 3) and other internal local roads will remain privately owned and maintained by Kiwi Property, despite being designed to public specifications. This mixed-ownership model can introduce long-term governance risks and may compromise maintenance consistency, especially around streetscape landscaping that for Parks and Community Facilities under the SLA with Auckland Transport and public access.
- 3.15. Streetscape planting presents concerns that we have raised with the applicant under stage 1. The applicant proposes an entirely native planting palette; however, several of the native species identified have demonstrated poor performance in open, exposed urban street environments and also pose toxicity risks for dogs, as well as a poor canopy closure. Furthermore, the planting strategy prioritises 160L large-grade trees, which can offer immediate visual impact and canopy structure but are generally less resilient during establishment compared to smaller 45L nursery stock, which tend to adapt more successfully to transplanting and constrained urban conditions.
- 3.16. There is currently no evidence that the planting strategy will meet Auckland Council's Urban Ngahere canopy cover targets (12–30%), nor is there evidence of compliance with AS2303 standards. The proposed species mix lacks ecological diversity, and the plans omit critical implementation details in terms of the road width and co-location of services to demonstrate adequate streetscape outcomes that involve elements such as tree pit design, spacing, sufficient soil volumes, and mulch depths, all of which are essential for survivability and long-term function to give effect to streetscape amenity.
- 3.17. While the conceptual landscape framework is well-articulated, reflecting mana whenua cultural narratives, green linkages, and a strong public realm vision, the proposal remains at a conceptual level and currently will not meet the technical requirements for the outcomes envisaged under Chapter 7 of the Auckland Code of Practice for Land Development and Subdivision or the Urban Ngahere (Forest) Strategy. For the landscaping design to be certified as acceptable, specifications around planting methodologies, weed management, and establishment practices will be deferred to the approval of the engineering plan (EPA) stage.
- 3.18. Whilst this is considered standard practice to shift detailed landscaping assessments to the Engineering plan Approval Stage, this approach fails to demonstrate how the landscaping will achieve Urban Ngahere outcomes, durability or meet long-term maintenance standards required for green public assets. Without an assessment to confirm the outcome envisaged for streetscape amenity to create a sense of place and belonging to the community it will serve, there is a clear risk that proposed streetscape planting will underperform or degrade, ultimately imposing long-term cost and operational risks on the Council whilst not mitigating the amenity effects resulting from the hard landscape and built form.

Reserve Landscaping

- 3.19. The applicant proposed to vest the Esplanade Reserves and drainage reserves along key stream corridors. The proposed riparian planting mixes are supported and appear consistent with the outcome typically expected for esplanade reserves.
The species selections reflect native vegetation appropriate for wetland and riparian margins, supporting biodiversity, erosion control, and long-term ecological resilience.
- 3.20. The proposed mixes are generally similar to those considered and accepted under Stage 1 of the development, where a focus on low-maintenance, eco-sourced native species was used to balance habitat restoration with ongoing maintenance obligations. This approach is consistent with Auckland Council's expectations for esplanade planting, provided species spacing, densities, and establishment methodologies are appropriately detailed at the EPA stage to ensure successful implementation and survivability

Amenity Delivery and Funding Commitments

- 3.21. Funding Commitments and Maintenance Uncertainty - Amenity delivery and long-term funding remain unresolved. While the application materials suggest a high standard of private amenity development, there is no formal confirmation that any recreational infrastructure, including play areas, landscaping, or civic furnishings, will be delivered to Auckland Council specifications, nor that it will be publicly accessible through a formal mechanism or be maintained to public standards. This introduces uncertainty around quality and durability, potentially resulting in substandard assets that fail to meet long-term community needs or require early renewal.
- 3.22. Draft conditions focus primarily on stormwater and transport delivery, but do not ensure the provision of civic and recreational assets to Council-approved levels. No interim maintenance programme or handover strategy is provided for vested reserves, and there is currently no CAPEX or OPEX funding allocated in the Long-term Plan to support early public asset delivery.
- 3.23. To avoid confusion regarding the management of non-vested assets, conditions should require the installation of clear signage identifying the entity responsible for ongoing maintenance and access rights. Additionally, a Residents' Society (or a similar legal entity) should be established and formally registered, with membership required for all future lot owners. This entity would be responsible for the long-term management and maintenance of all privately held open space and civic amenities.

Connectivity and Active Modes

- 3.24. Connectivity and Movement Network Constraints - While the proposal presents a comprehensive vision for a pedestrian-centric, connected environment, key regulatory concerns remain regarding the functional delivery of continuous, legible, and publicly accessible movement networks. The realignment and exclusion of Station Road as a key east-west structuring route introduce uncertainty about whether the development will achieve direct pedestrian and cycling access across the Metropolitan Centre, particularly between Valley Park, Hingaia Stream Reserve, the future Drury Central Train Station, and surrounding areas.
- 3.25. The application incorporates separate active transport facilities along public collector roads (e.g., Roads 2 and 25), internal walkways, and shared streets (such as Road 11), intended to

prioritise pedestrian activity. Within Hingaia Stream Reserve (Lot 610), which is proposed for public vesting, a 4m wide shared pedestrian and cycle path is proposed along the western edge of Te Ara Hingaia Road, whilst a shared pathway for pedestrians and cyclists, with a minimum width of 3 to 3.5 meters, is explicitly planned within the esplanade reserve (Lot 610).

- 3.26. This path connects to a network of meandering walkways and cycleways throughout the reserve, linking southwards to the wider Drury area, including key destinations such as the town centre and the future rail station. While these provisions support a high level of design intent, much of the connectivity framework relies on a combination of private and public ownership.
- 3.27. Notably, Valley Park is proposed as privately owned land with intended public access, but no formal legal instrument has been provided to secure public access in perpetuity. Valley Park is centrally integrated into the urban layout, connecting to Hotiki Road via the Town Square and linking with the key retail street. A wide promenade (15–30m) along its western edge serves as a primary pedestrian route extending north to Lot H. The park is connected to Lots G and E through adjacent plaza spaces, with buildings on Lot G (including a hotel and office) fronting the park and providing active edges. It is also located near the privately owned community facilities, an aquatic centre and library on Lot F, which are linked to Valley Park and the Town Square by a central urban plaza.
- 3.28. *Encumbrance of Esplanade Access* - The current configuration of Lot 610 (Esplanade Reserve) creates a risk of limited public access, as it is largely encircled by privately held open space (Lot 600) without any secured legal mechanisms guaranteeing access beyond informal pedestrian shared paths.
- 3.29. While these spaces are designed to function as high-amenity public realms, they are located on privately owned land, with no formal mechanism in place to secure public access or ensure maintenance to Auckland Council standards. This will result in long-term access disputes, reduced walkability, and a disjointed open space network that does not support inclusive movement across the centre. It will cause confusion over public rights of entry, reduced connectivity to the reserve, and the perception that the space is private, undermining its function as a publicly accessible esplanade.
- 3.30. The absence of a legal instrument, such as an easement, consent notice, or covenant, creates uncertainty around the long-term accessibility and upkeep of these spaces. This is particularly critical given their intended function as key pedestrian connections between the town centre, open space network, and stormwater infrastructure. Without conditions requiring public access and a defined maintenance framework, there is a risk that these areas may not deliver the anticipated connectivity or amenity outcomes over time.
- 3.31. In particular, key civic features such as Valley Park, the plaza, and the promenade, while designed for public use, are proposed on private land with no secured legal instruments to ensure public access and ongoing maintenance to Council standards. Conditions must require formal public access mechanisms and assign long-term maintenance responsibilities. These issues must be resolved to ensure the development meets Auckland Council's expectations for an accessible, connected, and enduringly functional Metropolitan Centre.

Stage 1 Subdivision of Super Lots

3.32. No spatial or material changes to the layout of roads, reserves, or public open space are proposed as part of Stage 1 under this subdivision application. The applicant is solely seeking to subdivide the residential superlots. All roads, reserves, and associated assets, including street tree planting, have already been assessed and approved under the existing Fast-track consent (reference BUN60414877). As such, no further assessment is required from a parks or open space planning perspective for this stage.

3.33. Residual Information Gaps

Information Gap	Nature of Deficiency	Decision-making Impact	Risk / Uncertainty
3.34. Neighbourhood park metrics	Detailed cross sections and site-specific design metrics due. Criteria include slope, flood-free status, and infrastructure-free zones.	Restrictions to assess acquisition suitability.	High – Inadequate and or unsuitable land may be accepted.
3.35. Retaining wall plans	Confirmation needed that walls near reserves are <1m and where to support private development that these are not intruding into land to be vested.	Affects interface design and passive surveillance and uncertainty encumbering land to be vested.	Medium – Poor CPTED outcomes possible and transfer of private maintenance responsibility to public.
3.36. Interface details	No clear CPTED treatment or boundary interfaces for Stage 2.6.1, 2.6.2 and Stage 2.3 reserves.	Park usability and visibility unclear.	Medium – Substandard edge treatments.
3.37. Canopy closure confirmation for street corridors	Needs alignment with Urban Ngahere and AT targets (15%/12%).	Council effects for amenity and biodiversity not met.	Medium – Weak ecological and climate outcomes.
3.38. Service line depths	Must enable front berm tree planting without conflict.	May restrict future street tree planting due to insufficient width and depth including	Medium – Reduced suitable tree canopy

		interference due to co-location of other infrastructure.	options and resulting in network costs.
3.39. Drainage reserve elements	Limited detail on fencing, bollards, maintenance access.	Difficult to confirm usability, safety, or function.	High – Can limit operational efficiency and compromise entire open space network
3.40. Landscape plans	Needs updated species selection for gradients, canopy, riparian zones and peat soils.	Difficult to mitigate built form and to facilitate the outcomes envisaged under the Urban Ngahere (Forest) Strategy (2019).	Low – Can be resolved at EPA stage.

4. STRATEGIC NETWORK EVALUATION AND POLICY FIT – PARKS AND COMMUNITY FACILITIES STRATEGIC ASSESSMENT AND RECOMMENDATIONS

Strategic Assessment of Surrounding Council-Owned Open Space Network

4.1. The Drury Metropolitan Centre is strategically located at the heart of the Drury-Opāheke structure plan area. It is anticipated to accommodate significant urban intensification, including residential, mixed-use, and transit-oriented development. When evaluating the proposed open space provision for the Centre, it is essential to consider how it integrates with existing council-owned parks and reserves within the surrounding catchment, particularly where no formal recreation facilities are proposed.

4.2. Proximity to Existing Council Open Spaces

Open Space	Approx. Distance from Function / Typology Centre		Accessibility Notes
Drury Sports Complex	~800m west	Suburb park with sports fields, clubrooms, car parking	Separated by Great South Road (arterial), limited pedestrian crossings
Jane Gifford Park	~550m northwest	Informal local reserve; passive open space only	Indirect access via residential streets; limited visibility
Bremner Neighbourhood (Future)	North Parks ~700–900m north	Planned neighbourhood parks within Auranga/Bremner	Access constrained by SH22 and Drury

			interchange infrastructure
Future Esplanade Reserves (Otuwairoa/Slippery Creek)	0–200m southeast	Ecological and passive recreation corridor (riparian)	Functionally limited due to flood constraints and potential private ownership
Drury School Fields	~600m south	Education-owned open space	Not publicly accessible or managed by Council
Proposed Open Spaces within Precincts C and D	~1–1.5km south and east	Anticipated neighbourhood/suburb parks (PC49/PC50)	Access requires crossing SH1 and rail corridor; not yet delivered or secured

Strategic Barriers and Severance Risks

- 4.3. The Drury Metropolitan Centre is encircled by significant transport infrastructure, creating physical and perceived barriers to accessing surrounding open spaces:
- a) State Highway 1 (SH1): Forms a significant east-west barrier with limited pedestrian/cyclist crossings.
 - b) Great South Road: High-volume arterial limiting safe pedestrian access, especially to Drury Sports Complex.
 - c) Rail Line: Linear barrier to the south separating the Centre from future precincts unless grade-separated crossings are delivered.
 - d) Slippery Creek Floodplain: Ecological value acknowledged, but flood-prone conditions and private ownership reduce its recreation utility.

Implications for Strategic Open Space Provision

- 4.4. While several parks exist within a 1km radius, their capacity to meet formal recreation needs for the Metropolitan Centre is constrained by functional limitations and access barriers:
- Few parks provide structured recreational amenities (e.g. playgrounds, sports courts, civic spaces).
 - Walking access is limited by arterials and hydrological constraints.
 - Several identified future parks are not yet secured or delivered and cannot be relied upon to support Stage 2 residents, i.e. there is no understanding on the delivery of the 7826m² park to be delivered under Stage 1 of this development.
- 4.5. Consequently, the Centre's internal open space network must be self-sufficient and capable of delivering civic space, informal play, and formal recreation. The current absence of a well-located, flood-free neighbourhood park and an undersized civic space presents a significant service gap that will need to be addressed through surrounding reserves and formal recreation provision, given the nature of the zoning. Failing to achieve this will place

disproportionate demand on inaccessible or undeveloped external reserves, reducing recreation equity and increasing social pressure on the wider network. could complement

- 4.6. Parks Planning also supports the recommendation for an additional neighbourhood park to be delivered within Stage 2 of the Drury development. While Stage 1 includes a neighbourhood park north-east of approximately 7826m², its catchment does not sufficiently extend to the entirety of Stage 2. Applying the Auckland Council standard 300m walking proxy for medium to high-density development (with 400m typically used for lower density), significant portions of Stage 2 remain unserved.

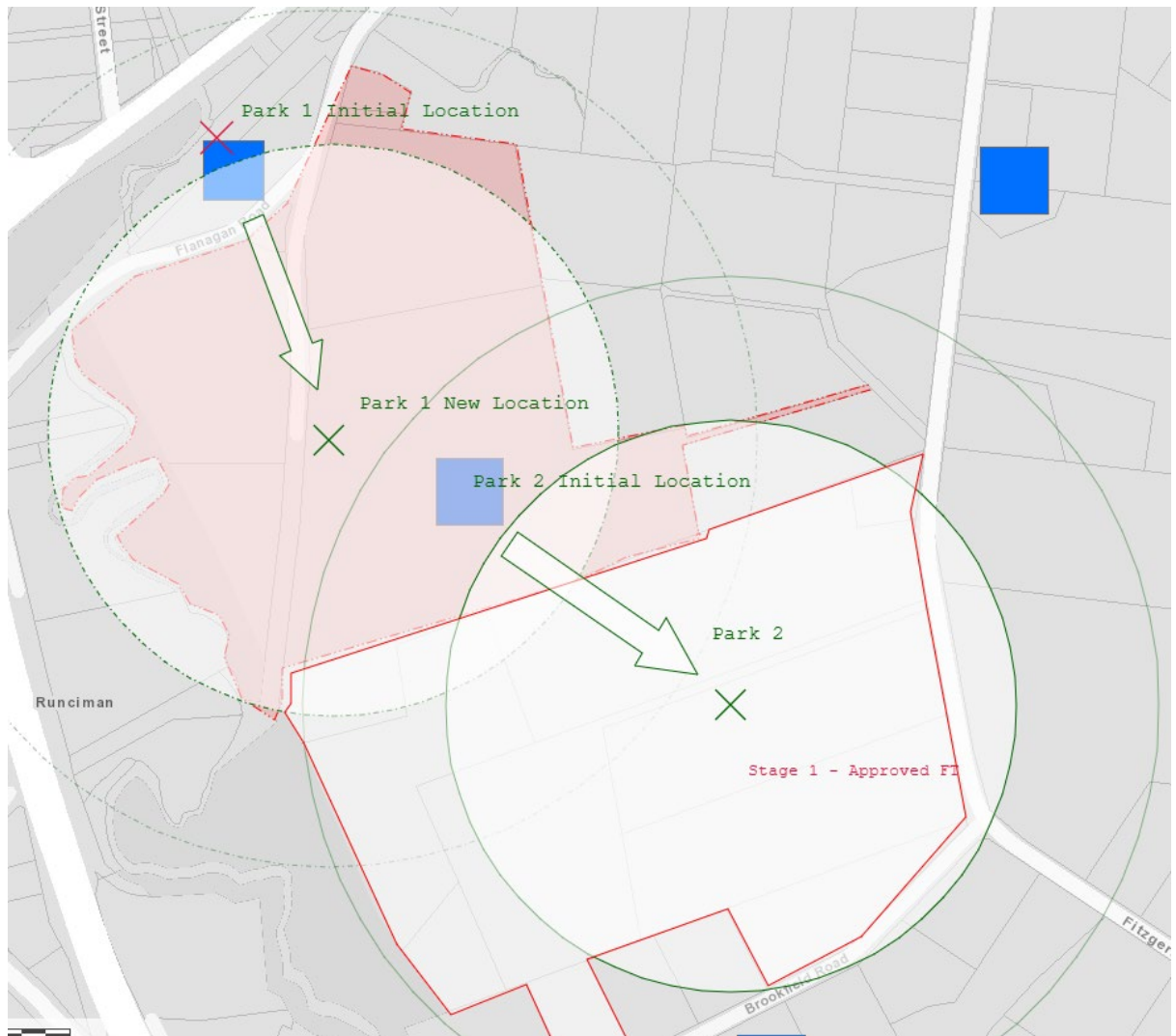


Figure 1 The assessment against Auckland Council's Public Open Space Evaluation (POSE), as illustrated by the blue boxes, supports the recommended provision of a neighbourhood park to meet catchment and service level requirements. The proposed realignment of open space enables improved spatial distribution and accessibility, particularly in relation to the 300m walkable threshold for medium- to high-density residential areas and the identified park locations are consistent with those anticipated and approved under Plan Change 48, for medium to high density areas.

- 4.7. There is strong spatial logic and strategic justification for introducing a new neighbourhood park to be located centrally in Stage 2, in proximity to the drainage reserve and along the

north-south Stream A corridor. This location benefits from good potential connectivity to the existing civic space, Stream A pathway, and the future suburban park to the east. It also aligns with the vision of the Drury Precinct Plan recently approved, which envisages a coherent network of open spaces with cross-site movement from west to east via esplanade and drainage reserves.

- 4.8. Without the inclusion of a centrally located neighbourhood park, the proposed development risks generating disproportionate reliance on the surrounding open space network, which is already constrained. The absence of internal provision shifts the demand burden onto nearby parks such as the Drury Sports Complex and Bremner North neighbourhood parks resulting in material adverse effects on open space equity and the viability of recreation delivery. However, arterial barriers separate these external spaces and were not designed to accommodate the service needs of the Drury Metropolitan Centre population. This represents a failure to embed open space equity within the development, resulting in significant cumulative operational pressure on existing Council assets, particularly in the absence of secured land for expansion or retrofitting.
- 4.9. This request is not solely about increasing the overall quantity of open space, but is intended to ensure the provision of open space that can accommodate formal recreation needs and to improve the spatial distribution of parks in alignment with the strategic intent of the precinct plans. This would enhance safety, connectivity, and user experience by leveraging quieter internal streets and improving alignment with CPTED and open space planning outcomes.
- 4.10. Council is seeking the provision of an additional flood-free neighbourhood park within the development to ensure a functional and usable open space is delivered. This request is not solely about increasing the overall quantity of open space, but rather ensuring the inclusion of a park that can accommodate formal recreation needs and improve the spatial distribution of open space in alignment with the strategic intent of the precinct plans.
- 4.11. While some internal courtyards are proposed within the block developments in Stage 2, these appear to be inward-facing and primarily serve as private or semi-private spaces with an emphasis on parking and circulation. As such, they do not provide sufficient publicly accessible open space to meet the needs of the broader residential population. A well-located neighbourhood park would enhance safety, connectivity, and overall user experience by leveraging quieter internal streets and aligning with CPTED principles and open space planning outcomes.
- 4.12. To address this gap, Council recommends the inclusion of an additional flood-free neighbourhood park within Stage 2, with a minimum size of 3,000m². The preferred location is within Stage 2.6.2, specifically in the north-western corner of Lot 36, situated between Lot 500 (Road) and Lot 512 (Road). Lot 36 has a total area of 11,401m², and it is considered both feasible and appropriate that 3,000m² of this area be secured and offered as land in lieu of a recreation reserve. This would meet Auckland Council's Open Space Provision Policy (2016) for metropolitan centre zoning and deliver land that is unencumbered, accessible, and capable of accommodating formal recreation infrastructure. The recommended location would also strengthen the east-west pedestrian connection between the esplanade reserve and the stormwater wetland via the proposed promenade, while supporting civic functions and community activities currently unaddressed within the development.

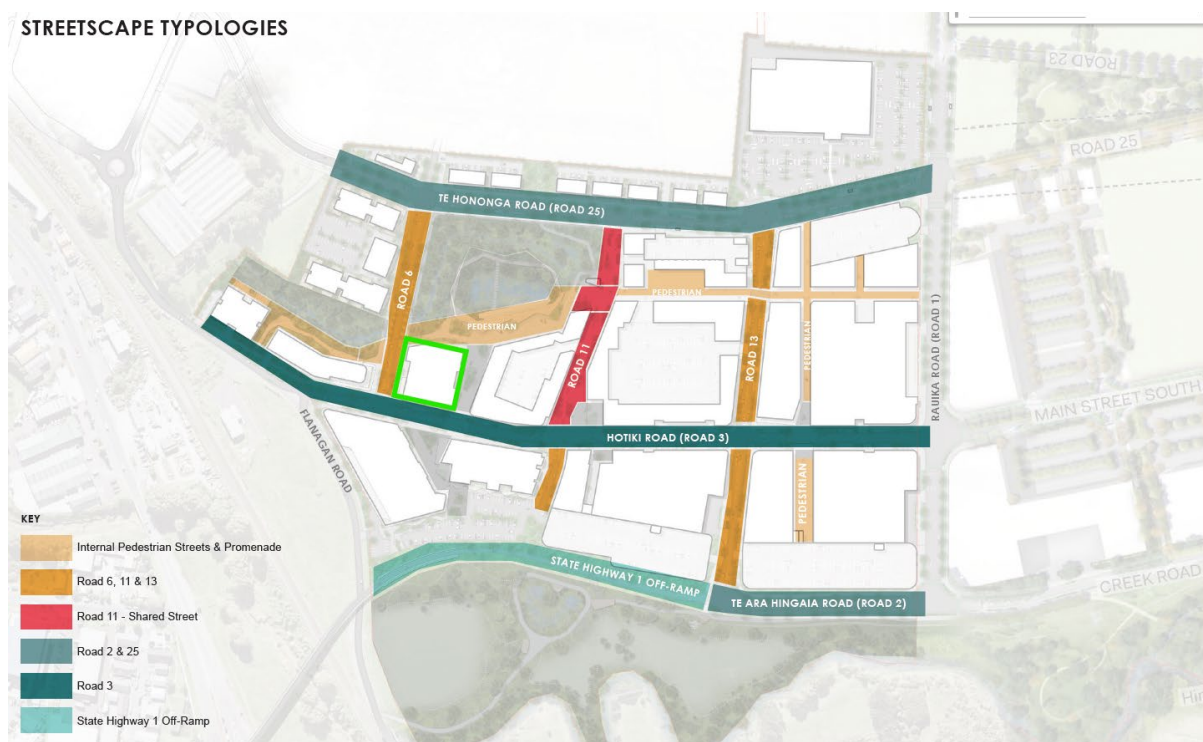


Figure 2 The Council's preferred location for a neighbourhood park. The green square indicates the preferred location for a park to be transferred to the neighbourhood by the council as a neighbourhood park under Stage 2.6.2, specifically in the north-western corner of Lot 36, situated between Lot 500 (Road) and Lot 512 (Road).

- 4.13. In summary, a 3000m² neighbourhood park in Stage 2 is required as an essential element of the open space network. It would strengthen the internal network's functionality, ensure distributed accessibility, and optimise linkages between civic and ecological assets. Careful consideration should be given to include this provision as a condition of consent.
- 4.14. This recommended configuration meets 400m access targets, improves network efficiency, and reduces long-term asset costs, while delivering resilient, accessible, and equitable formal recreational assets that would give effect to the outcomes sought under the precinct provision.

RECOMMENDATIONS

- 4.15. Key reasons and recommendations for the Applicant to address the issues and concerns outlined in the above assessment are summarised below. It is considered that these recommendations are critical to understanding effects and feasibility of the development. It is not believed that these can be deferred to later stages, due to the impact they may have on the overall viability of the development un unable to be retrofitted into a developed area.
- 4.16. A review has been undertaken of the applicant's proposed draft conditions. It is acknowledged that several of Auckland Council's standard Parks and Community Facilities conditions have been appropriately incorporated.
- 4.17. These include:

- a) Review and approval of hard and soft landscaping assets during the Engineering Plan approval (EPA) stage;
 - b) Implementation conditions relating to the delivery of open space and amenity assets;
 - c) Maintenance and monitoring conditions throughout the establishment period; and
 - d) Bonding conditions to secure compliance and ongoing asset performance under s222.
- 4.18. While the inclusion of these conditions is supported, there are minor inconsistencies when compared to Parks' standard conditions. Additions and amendments have been made or conditions replaced to align with those ones of Parks.
- 4.19. To ensure the open space network supports the intended metropolitan land use outcomes, the following key recommendations are made:

Provision of an Additional Neighbourhood Park in Stage 2

- 4.20. A new flood-free, publicly accessible neighbourhood park of no less than 2,000- 3,000m² should be secured within Stage 2. This park should:
- a) Be located centrally adjacent to the Stream A corridor and the 2.6ha drainage reserve to maximise network integration;
 - b) Support informal recreation and formal asset development (e.g. play, courts and social infrastructure) in a distributed manner across the site;
 - c) This park should be unencumbered, capable of supporting a 30m x 30m kick-about space, and preferably located on flat land ($\leq 3\%$ slope) with strong street edge visibility to ensure accessibility for all users.
 - d) Be designed to meet the Manaaki Tāmaki Makaurau – Auckland Open Spaces, Sports and Recreation Strategy (2025) proximity target of 300m for medium to high-density areas.

Civic Space Expansion and Redesign

- 4.21. The proposed civic plaza should be:
- a) Enlarged to achieve the strategic benchmark of 2,000–4,000m² for metropolitan centres;
 - b) Redesigned to avoid triangular geometry, reduce road interface conflict, and increase legibility as a community focal point;
 - c) Anchored spatially within the urban core to support active modes and event-based use.

- d) To align with strategic benchmarks for metropolitan centres, and in recognition of the current shortfall in publicly accessible civic space, emphasis should be placed on the recommended neighbourhood park as a potential solution. If appropriately located and designed, the additional recommended park under section 4.12 in my assessment could help accommodate both formal recreation needs and some of the civic space functions not currently provided elsewhere in the development. This would support the creation of a more integrated and multifunctional public realm, consistent with the expectations for a Metropolitan Centre.

Secure Public Ownership of Key Open Spaces

4.22. The current reliance on privately held drainage and amenity land creates uncertainty around public access and delivery standards.

4.23. It is recommended that:

- a) Any land intended to provide core recreation functions (playgrounds, passive parkland, civic spaces and thoroughfare) be vested to Auckland Council or legally secured through enduring public access arrangements such as easements;
- b) Draft conditions be amended to clearly distinguish stormwater management areas from land intended to deliver recreation or civic functions.
- c) Privately owned but publicly accessible open spaces and access connections and walkways are sign posted at entries to clearly identify

Landscape and Amenity Delivery Conditions

4.24. The following matters should be secured through revised consent conditions:

- a) Updated and peer-reviewed street tree and reserve planting palettes, aligned with Auckland Council's Urban Ngahere Strategy (2019) and Auckland Transport Sustainability Strategy and capable of achieving 12–15% canopy closure, therefore demonstrating adequate soil volumes and availability within road corridors;
- b) Specification of AS2303-compliant tree stock and design standards for berms and street corridors;
- c) Integration of recreation assets (e.g. seating, play, shade) into vested reserves to a standard consistent with Auckland Council design specifications subject to Local Board Approvals;
- d) Landscape and CPTED interface treatments along park and civic edges to ensure visibility, safety, and activation.

Clarity on Funding, Delivery, and Maintenance Responsibilities

4.25. As the land subject to this application has already undergone a formal plan change and is expected to align with Stage 1 delivery as approved under BUN60414877 standards, the following timeframes are recommended to be consistent with the Councils current conditions:

- a) A 3-year maintenance period (with bond) for streetscape assets and vested roads;
- b) A 5-year maintenance and monitoring period (with bond) for vested reserves;
- c) A staged implementation and handover strategy should be confirmed at the EPA stage.

4.26. Please refer to Appendix A for the recommended changes and additions.

5. CONCLUSION

- 5.1. Parks and Community Facilities does not support the current proposal from a parks and open space planning perspective due to the absence of any formal recreation provision in the form of a neighbourhood park within Stage 2. This omission is considered a significant adverse effect from a parks planning perspective for service provision of a Metropolitan Centre, particularly given that the neighbourhood park proposed in Stage 1 remains in private ownership, its delivery timeline and service provision are uncertain, and it sits outside of the walkable catchment to service Stage 2 community needs within a high density development, civic of nature.
- 5.2. While the proposed Valley Park promenade, integrated with adjacent plaza spaces on Lots G and E and a shared space/pedestrianised segment of Road 11, is intended to function as a civic space, its triangular geometry and constrained area (ranging between 800–1,375m²) fall short of the 2,000–4,000m² benchmark typically applied to civic spaces within metropolitan centres. Although initial concerns were raised regarding the size, layout, and adjacency to vehicle circulation, further consideration has been given to how the space could contribute to the civic network if designed to a high standard.
- 5.3. Specifically, Parks and Community Facilities now acknowledge that, if supported by the provision of an additional formal neighbourhood park in close proximity, capable of accommodating broader civic and recreational functions, the plaza and promenade can complement the network as hard open space. This change in position reflects a strategic shift to treat the plaza as part of a layered civic offer, rather than the sole provider of civic function. However, due to its atypical configuration, the success of this space remains highly dependent on securing strong pedestrian prioritisation, active frontage design, and formal public access mechanisms to ensure functionality and inclusivity over time. Without adjacent green space provision, the civic offer may become overburdened and unable to accommodate flexible community use or active recreation.
- 5.4. The proposal includes publicly accessible passive open spaces and riparian corridors, including esplanade reserves, that contribute positively to ecological and stormwater outcomes as anticipated. Only subject to the inclusion of robust conditions, particularly public access easements where necessary, refined implementation conditions and long-term maintenance standards, will Parks and Community Facilities be able to support the proposal. Without a secured legal mechanism such as an easement or covenant guaranteeing public access in perpetuity, the civic space cannot be relied upon to deliver long-term community benefit or support Council-aligned levels of service.
- 5.5. It is to be acknowledged that the lack of secured, flood-free recreation reserves capable of accommodating formal recreation infrastructure undermines the proposal's alignment with the Auckland Council Open Space Provision Policy (2016), Manaaki Tāmaki Makaurau (2025), and

the Drury Centre Precinct Plan that provides the direction for an outcome envisaged and to serve that community with the necessary community infrastructure.

- 5.6. I recommend that the proposal include a 2,000–3,000m² flood-free neighbourhood park centrally located within Stage 2.6.2, specifically in the north-western corner of Lot 36, situated between Lot 500 (Road) and Lot 512 (Road), adjacent to the Stream A corridor. This intervention would ensure distributed access to formal recreation opportunities, resolve the identified spatial gap, and future-proof the development for intensification.
- 5.7. Without a designated flood-free neighbourhood park in Stage 2, the development risks undermining long-term service equity and the effective delivery of social infrastructure. Public spaces located within stormwater or privately owned land are not fit for purpose for enduring recreation and cannot meet community needs during regular or adverse weather events. This limits opportunities for active lifestyles, placemaking, and civic engagement, particularly for families and children in high-density housing. This gap creates a significant and enduring deficiency in recreation provision for the area. The lack of provision will also create cumulative pressures on wider civic and recreational assets in Drury, many of which are not yet funded or are themselves constrained by floodplains or severance from the development area.
- 5.8. Unless the proposal is amended to secure this additional neighbourhood park and strengthen civic provision through size and access improvements, the development risks failing to meet the open space and recreation expectations anticipated for high-density metropolitan environments. As such, the inclusion of conditions that secure public access, delivery timeframes, and maintenance responsibilities for all publicly intended open space assets, are recommended.

6. PROPOSED CONDITIONS

- 6.1. Parks and Community Facilities acknowledges the applicant's intent to deliver a network of blue open spaces as part of the Drury Metropolitan Centre development. However, there are significant concerns regarding the reliance on privately owned land to deliver essential civic and recreational outcomes. While the proposed network integrates stormwater management and ecological enhancement within open space corridors such as Valley Park, Wetland 2-1, and the riparian margins, these spaces are not proposed to vest in Auckland Council and therefore lack the long-term security and governance required for enduring public use.
- 6.2. In particular, the civic spaces and promenades proposed within privately owned blue infrastructure risk being misperceived as public assets, creating operational and reputational risks for Council. Without legal mechanisms to secure public access and maintenance standards, these areas cannot be relied upon to deliver formal recreation, civic gatherings, or community infrastructure typically expected in a Metropolitan Centre context. The lack of a flood-free, publicly vested neighbourhood park further compounds these issues, leaving a critical gap in provision.
- 6.3. While Parks and Community Facilities supports the principle of integrating water-sensitive design and amenity outcomes through a blue-green network, this must be accompanied by secure public ownership or formal access easements, appropriate funding mechanisms, and alignment with Council's strategic open space and recreation goals. The current proposal does not achieve this balance. These areas are not secured for enduring public use, as no formal recreation vesting, legal easement, consent notice, or covenant has been proposed to formalise

public access rights or maintenance obligations. Accordingly, robust conditions are required to address public access, civic space functionality, and the enduring performance of these assets if the Panel is minded to grant approval.

- 6.4. If the Panel is minded to grant approval, additional and recommended conditions sought from a parks planning perspective are provided as per Appendix A.