

Memorandum

To:	Russell Butchers Premium Lead (AC) Masato Nakamura Consultant Planner (AC)
From:	Matt Ford Senior Development Planner (AT)
Date:	29/10/2025
Subject:	FTAA-2502-1019 (BUN60447489) - Stage 2 Drury Metropolitan Centre Draft consent conditions
Site Address	120 Flanagan Road, Drury

1. Land use Conditions

1.1 Update to ROW D - LUC 85 condition

- Auckland Transport (AT) supports the inclusion of the revised Row D “*Full (Plan Change design) Waihoehoe Road Ultimate Upgrade as per Attachment 4*”, as this was agreed upon during expert conferencing on the 3rd October 2025.
- Row F trigger point for 78,500m² of retail Gross Floor Area (GFA) appears to be precinct total numbers, as opposed to the slightly lower earlier numbers the Applicant has sought consent for. Can the Applicant clarify this discrepancy.
- The extent that consent is based on new land use mixes that depart from those within the precinct plan should be recorded in any decision by way of a new requirements table. This will create transparency and indicate to any other developers within the 3 precincts the remaining enabled capacity vs what has already been consented. Changes in mixes should not materially affect development thresholds across other precincts, e.g. residential development in Waihoehoe and Drury Central precincts should not have a higher threshold (more infrastructure needs to be in place before precinct defined set levels of developments can occur) because Drury Central has reduced the requirements for retail GFA.
- In the preconference version of the land use make up, the number of dwellings provided for up to the point where a new Drury interchange was required fell from 3800 to 3300. This was not covered in expert conferencing despite AT requests it should be. A table has been added from Applicant’s latest material with changes sought to residential caps to reflect what is in precincts. This will need to be offset by a reduction in retail or commercial GFA to be provided by the Applicant.
- It is recommended that a discretionary alternative upgrade of the direct south connection (off ramp) be added to the condition, as this may release some additional development if it proceeds ahead of the full plan which relies on Council funding of major works (new Norrie Road bridge). This is reflected below as ‘alternative (d)’ in the table below that is used for Condition 85. This is because it would remove some

traffic from the Great South Road / Waihoehoe Road intersection and release some development capacity if it occurs before the Council deliver the ultimate intersection.

- AT seeks to add a new advice under Condition 85. This is to ensure that anyone who buys a single household lot and wishes to build on it should be able to do so without risk that may exceed a transport threshold and be declined. See advice note 5 below.
- AT recommends a new advice note be provided referring to the updated thresholds referred to by the Applicant. See advice note 6 below.

Column 1 Activities, development or subdivision approved in this consent	Column 2 Transport infrastructure required to enable activities, development or subdivision in Column 1
(a) Up to a maximum of: (i) 5,000m ² retail GFA	No upgrades required
(b) Greater than 5,000m ² and up to a maximum of 32,000m ² retail GFA	<p>(a) Ultimate Waihoehoe Road upgrade between Fitzgerald Road and Great South Road in accordance with Appendix 1 of I450.11 of the I450 Drury Centre Precinct, including:</p> <ul style="list-style-type: none"> (i) Two general traffic lanes and two bus lanes, footpaths and cycleways on both sides, and a new six-lane bridge over the railway corridor; and (ii) Signalisation and increased capacity at the Great South Road/Waihoehoe Road intersection (as per NZTA / RoRS Design as per Attachment 3), including fully separated active mode facilities. <p>(b) Drury Central Rail Station including pedestrian connection</p>

	to Waihoehoe Road.
(c) Greater than 32,000m ² retail, up to a maximum of: (i) 45,000m ² retail GFA	(c) State Highway 1 widening to six lanes between the Papakura interchange and Drury Interchange.
(d) Greater than 45,000m ² retail GFA, up to a maximum of: (i) 71,000m ² retail GFA; and (ii) 400 dwellings.	(d) Full (Plan Change design) Waihoehoe Road Ultimate Upgrade as per Attachment 4
PLACEHOLDER TEXT: <u>Alternative (d) numbers to reflect reduced traffic impact on key intersection as a result of direct connection. Can be assigned all to retail and/or commercial.</u>	<u>(d) Direct southbound connection from State Highway 1 to the Drury Centre via a single lane slip lane from SH1 interchange to Creek Road. Creek Road is within the Drury Centre Precinct and is shown on Precinct Plan 2 of I450 Drury Centre Precinct.</u>
(e) Greater than 71,000m ² retail and/or 400 dwellings up to a maximum of: (i) 78,500m ² retail GFA; (ii) 6,000m ² commercial GFA and; (iii) 600m ² community GFA.	(e) Mill Road southern connection (or another form of southern connection) between Fitzgerald Road and State Highway 1, including a new SH1 Interchange at Drury South - the "Drury South interchange"; and (f) Direct southbound connection from State Highway 1 to the Drury Centre via a single lane slip lane from SH1 interchange to Creek Road. Creek Road is within the Drury Centre Precinct and is shown on Precinct Plan 2 of I450 Drury Centre Precinct.
(f) Greater than 78,500m ² retail	(g) Mill Road northern connection

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<p>GFA and/or 6,000m² commercial GFA and/or and 600m² community GFA and/or 400 dwellings, up to a maximum of:</p> <p>(i) 97,000m² retail GFA;</p> <p>(ii) 47,000m² commercial GFA;</p> <p>(iii) 10,216m² community GFA</p>	<p>(or another form of northern connection) between Fitzgerald Road and Papakura, including ultimate upgrade of Waihoehoe Road East from Fitzgerald Road to Mill Road; and</p> <p>(h) Ultimate Opāheke Northern connection, providing four lanes including bus lanes and active mode facilities between Waihoehoe Road and Opāheke Road in Papakura.</p>
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Advice Note 5

This consent will provide capacity for those dwellings to be established on site (when the relevant infrastructure upgrades are in place), but does not negate the requirement for those activities to obtain consent for a new building or comply with the transport upgrades standard in the absence of those upgrades being in place.

Advice Note 6

The transport infrastructure approvals are based on the following revised mixes of land uses and infrastructure:

Row	Transport Infrastructure	Expected Completion	Level of Development enabled by Transport Infrastructure				
			Residential (Dwellings)	Retail (GFA)	Commercial (GFA)	Community (GFA)	Drury East Peak Hr Trip Gen
(a)	Existing GSR / Waihoehoe roundabout	N/A	Up to 600 units	Up to 5,000sqm	-	-	Up to 800 trips
(b)	Waihoehoe Road Ultimate upgrade incl Full NZTA GSR/Waihoehoe signalisation	Early - mid 2028	600 to 1,100 units	5,000 to 32,000sqm	-	-	800 to 2,000 trips
	Drury Central Rail Station	Late 2026					
(c)	SH1 Six-laning Papakura to Drury.	2030	1,100 to 2,660 2,196 units	32,000 to 71,000sqm 45,000sqm	-	-	2,000 to 3,800 trips 2,053 trips
(d)	Full (Plan Change Design) Waihoehoe Ultimate Upgrade	Unknown	2,196 – 2,660 units 3300	45,000 to 71,000sqm	-	-	2,883 to 3,800 trips
(e)	Mill Road southern connection (Fitzgerald to SH1 incl. Drury South Interchange)	Not programmed	2,660 to 3,300 units	71,000 to 78,500sqm	up to 6,000sqm	Up to 600sqm	3,800 to 4,300 trips
	SH1 direct southbound connection	Not programmed	3800	Reduce		Up to 2400	
(f)	Mill Road northern connection	Not programmed	3,300 to 5,800 units	78,500sqm to 97,000sqm	6,000 to 47,000sqm	600 to 10,000sqm	4,300 to 5,600 trips
	Opāheke northern link	Not programmed	3800	Reduce			

1.2 Flanagan Road upgrade - LUC condition 85B

AT support this condition, however, recommend removing the advice note as it refers to a timeframe that cannot be specified due to its reliance on a third party.

1.3 Vesting of signals - LUC Condition 87

Condition 87 only covers signals on roads to be vested. If there are to be any traffic signals on private road intersections, we suggest that the consent holder be required to connect them to the ATOC SCATS system and put them under the operational control of ATOC, with the consent holder required to pay ongoing fees to ATOC for this service.

AT suggest replacement wording as follows:

~~87. All new traffic signal hardware within roads to be vested must be vested to Auckland Transport. The Consent Holder must meet all costs of vesting these assets. Any traffic signals constructed by the consent holder, regardless of the location on private or public roads, must be commissioned by Auckland Transport Operation Centre (ATOC) and connected to the region wide system of traffic signals ahead of becoming operational. The signals must be managed by ATOC.~~

1.4 Public transport on private roads - LUC condition 89F

Overall, AT support the intention of this condition however it needs more consideration to be effective and robust. The use of the wording “*must enable*” is quite broad. AT would like to clarify what this will mean and what it does exactly. It doesn’t clearly define *how* the consent holder is expected to enable public transport. Does it mean physical access, legal rights, operational coordination, or all of the above? Different parties (e.g. Council, developer, AT) might interpret “*enable*” differently, which could lead to disputes or compliance issues. There is no clear performance standard or deliverable tied to the term.

AT recommends adding some wording around requiring coordination with the relevant public transport authority (e.g. AT) to ensure operational matters are discussed with AT and wording to add in specificity of the use of Road 3.

Instead of “*enable*” AT suggest “*must provide and maintain access for public transport vehicles and coordinate with Auckland Transport to facilitate interim bus services on Roads 6 and 3*”.

AT suggest replacement wording as follows:

~~89F. The Consent Holder must enable the ongoing interim provision of public transport on private roads Road 6 and Road 3, north of its intersection with road 6, (once they are constructed) until such time that the ultimate bus route is provided on Road 25 as a public road to be vested. provide and maintain access for public transport vehicles and coordinate with Auckland Transport to facilitate interim bus services on Roads 3 (north of its intersection with Road 6) and Road 6, (once they are constructed) until such time that the ultimate bus route is provided on Road 25 as a public road to be vested.~~

1.5 Comment on LUC condition 92 – review condition

1.5.1 What condition(s) the review should relate to

As stated in AT's memorandum to the council dated 11 August 2025, AT are still of the view that there is insufficient evidence to support the Work from Home (WFH) claims. As such AT were concerned about the potential effects arising from the uncertainty of assuming reduced trip rates and generation.

The review condition should relate to monitoring the traffic effects over time to assess whether the Applicant's assumptions correct and mitigated if/when adverse effects are generated. AT agrees with the Panel that the wording of the s128 condition is very broad.

The main text doesn't specifically state that it is limited to traffic effects related to congestion and capacity. The reader is left to infer this from the advice notes along with the other traffic related conditions in the consent. This review condition should primarily relate to Condition 85, and the potential traffic / transport effects of the switching of the timing of the infrastructure triggers but also consider the utilisation of the WFH trip rates.

1.5.2 The range of possible mitigation measures that could arise from such a review

The SIDRA modelling AT were presented at the expert conferencing showed an optimised situation in terms of minimising overall delay, while giving every approach at least some green time. Movements can be given more green time if there is a reason to favour them (for instance bus routes), but it results in a greater overall average delay and it can only be taken so far. AT suggest that in a scenario where the effects of delay at the intersection are very significant, that a Travel Plan be adopted for staff working in the development could help. The applicant could cover the public transport fares for all the retail staff to encourage them to take the train, by way of example. However, this should be further detailed by the applicant and how they expect to mitigate the effects of their development.

1.5.3 Additional comments on the review condition

- The condition does not actually require the consent holder to gather any monitoring data or provide an assessment. If we want to know if interpeak delays reach Level of Service (LoS) F or average queues are reaching adjacent intersections then this will need data to be collected by the consent holder.
- The advice notes say Council cannot treat interpeak LoS of better than F as an effect or average queue lengths which overspill into an adjacent intersection, but this is not the same as saying that only interpeak LoS and average queue lengths are to be considered. The precinct plans were predicated on a certain tolerance of peak period congestion, provided it did not impact public transport. However, if the plan changes did nominate LoS D to apply to the interpeak periods on the basis that this gave trip makers an opportunity to transfer from peak to interpeak. The reference to LoS F is not appropriate in AT's view.

- AT do not support the use of the 'overspill'. AT would prefer to use "Average peak hour queue lengths do not reach an adjacent intersection". Overspill implies that the queue has to be inside the adjacent intersection for there to be an effect, but legally drivers are not allowed to enter an intersection if the exit is not clear, so there could be an effect where drivers are waiting on the far side for the exit to clear, and the queue doesn't go into the actual intersection.
- The term 'interpeak' is not clearly defined. Is it just a weekday period between AM and PM peaks? When does it start and end? Does it include the weekend? Is 11am on a Saturday considered inter-peak? The applicant should provide these types of details to define what they are considering the interpeak.

1.6 Comment on LUC condition 93 – Road Safety Audit

Road Safety Audits were renamed Safe System Audit Guidelines in 2022 and the document covering the process is the New Zealand Transport Agency Safe System Audit Guidelines (copy attached). AT can't find a copy of the New Zealand Transport Agency Procedure Manual referred to in the condition wording. The wording for the condition should clearly state that the Safe System Audit Report must be provided with the Engineering Approval application 'can' should be amended to 'must' in the wording.

AT suggest replacement wording as follows:

93. These are to be carried out in accordance with the New Zealand Transport Agency ~~Procedure Manual~~ Safe System Audit Guidelines by an independent and appropriately qualified safety auditor. The Safe System Audit Report shall be provided to the Council prior to construction of the relevant intersection. Any recommendations raised in the audit report must be implemented to the satisfaction of the Council and ~~can~~ must be submitted as part of the application for an EPA Engineering Approval.

2 SUB Conditions, pages 58 – 87

2.1 Comment on the proposed deletion of condition SUB 120 / 141A

AT supports the Council's position on the retention of the 224(c) condition. This is reflected in Council's memorandum in sections 10 and 11. Enabling subdivision to occur in advance of operational transport infrastructure is misaligned with I450 Drury Centre Precinct plan. This is reflected through the precinct Objectives and Policies. Interest to retain this was also expressed by the Applicant when they offered the condition on an Augier basis. Removing this condition would impact the integrity of the precinct plan and provisions.

2.2 Comment on SUB condition 3A

The Panel would like confirmation of if the matter of public transport still being able to be provided if staging is altered is addressed by Condition 3A.

AT's concerns relate to the inability to efficiently service the centre by bus once it reaches a certain level of development in the absence of a direct route through the centre to the station/bus interchange. The suggested wording implies that a longer and more indirect route could be adopted, which would not entirely be supported by AT. The condition would benefit from redrafting to provide more of an imperative for a direct route, whilst addressing the applicants concerns around high sunk costs ahead of when the infrastructure is needed.

There is ambiguity in the wording "*demonstrate how and where*". This could be interpreted loosely. Does "*demonstrate*" mean a plan, a report, a traffic assessment? To whom is this demonstrated to, the Council? AT suggest the applicant specifies the mechanism and recipient. E.g., "*...must submit to the Council's satisfaction a plan showing how public transport access will be maintained...*"

AT suggest replacement wording as follows:

~~3A. Where alternative staging of subdivision is proposed from the sequence as identified on the approved scheme plans in Attachment 2 of this consent, the Consent Holder must demonstrate how and where public transport circulation and efficiency access will be provided to the Stage 2 area of the Drury Centre Precinct (including by using existing public roads) until such time that the ultimate bus route is provided on Road 25 and the interim bus route is provided on Road 6 and Road 3. If the consent holder proposes to implement subdivision stages in an order that differs from the sequence shown on the approved scheme plans in Attachment 2 of this consent, the consent holder must submit to the Council for certification a plan demonstrating how public transport circulation, efficiency and access will be maintained to the Stage 2 area of the Drury Centre Precinct. This plan must show how access will be provided (including via existing public roads) until such time as the ultimate bus route is constructed along Road 25, and the interim bus route is operational along Road 3 and Road 6. The certified plan must be implemented by the consent holder at each stage of subdivision.~~