1.0 National Policy Statement on Urban Development 2020

Objective/Policy	Assessment
Objectives	
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The project is for a comprehensively planned, transit-orientated metropolitan centre which has been earmarked in the Council's Drury-Opaheke Structure Plan since 2019 and is now embedded in the AUP. The project will deliver stage two of the Drury Metropolitan Centre, a transit orientated development focused around the new Drury Central Train Station planned to be constructed and operational by 2025/early 2026 as part of the Government's New Zealand Upgrade Programme. The project includes the development of a new metropolitan centre with a focus on large format retail activities and fine-grained retail, commercial, community and visitor accommodation activities and a total of 394 residential dwellings (mixture of apartments, work/live terraces and vacant lots) within walking distance to a rapid rail corridor. The comprehensively planned and transit-oriented nature of the development will ensure that the project will deliver and contribute to well-functioning urban environments. The project, will complement the urbanisation project occurring in Drury including Stage 1 of the Drury Centre and will provide for the social, economic, and cultural wellbeing, and for their health and safety both now and into the future.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The project will deliver 102 dwellings (mixture of apartments and work/live terraces) and 292 vacant lots ranging between 200m² - 342m². With respect to the vacant lots, the general size and shape of the lots proposed ensures that there will be sufficient flexibility to deliver a range of quality building types and densities consistent with the expectations of the AUP zoning and precinct. It is also noted that any future development across these vacant lots could occur across multiple lots, enabling larger and higher intensity building forms to be accommodated. Overall, the residential activities proposed as part of this development will significantly contribute to housing stock in an accelerated manner because these lots will be serviced with all the necessary local infrastructure connections and will be serviced with the necessary roading for access. This is considered to support competitive land and development markets.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and	This objective is not applicable as it relates to the preparation of regional policy statements and district plans.

community services to be located in, areas of an urban environment in which one or more of the following apply: (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-serviced by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	Notwithstanding, the proposal will deliver approximately 102 residential dwellings in the Stage 2 area and 292 vacant residential lots in the Stage 1 area to provide capacity in the medium term within walking and cycling distance of the first stage of Drury Centre and the Drury Central Rail Station, which is due for completion in 2025.
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The project will deliver the second stage of Drury Centre which will become a key focal point providing employment, retail and amenity for the wider southern Auckland area. It will also deliver the construction of 102 dwellings (mixture of apartments and work/live terraces) and 292 vacant lots which will enable for dwellings of a range of typologies and sizes which will contribute to the emergence of a diverse and vibrant community. This will also assist in responding to the changing needs of people, communities and future generations.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	The proposal has been developed with active and on-going engagement with iwi authorities to ensure that the principles of the Treaty of Waitangi are taken into account.
Objective 6: Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.	The proposal will be coordinated with the delivery of all of the necessary infrastructure (including roading and active transport facilities, stormwater, wastewater, water supply, electricity, gas and telecommunications). All of the necessary infrastructure to accommodate the proposal is either already in place, near completion, or will be established and funded by the applicant. As such, the proposal is unaffected by infrastructure planning and funding decisions. The project is strategic over the medium and long term. In the medium term, the project will accelerate the delivery of Drury Centre to support urbanisation in wider Drury as well as residential lots to ensure that the fully funded Drury Central Rail Station, which is planned for completion in 2025, will have an established destination and residential catchment to serve but also support the success of this train station and encourage the use and uptake of this sustainable transport mode. The project is consistent with the land use, roading pattern and built forms anticipated by the Drury-Opaheke Structure Plan 2019 (and consequently Plan Change 48), such

	that the project has been strategically developed to remain in keeping with the long-term vision of the Drury East area. The project is responsive as it will result in approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 dwellings and 282 hotel rooms across. In addition, 292 vacant residential lots are also proposed within the original 13 residential superlots previously consented as part of Stage 1. Therefore, the project will supply significant development capacity in the medium to long term.
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	This objective is not applicable to the project as it relates to the availability of information about urban environments in order to inform planning decisions. We do note, however, that the consent application for the project will be supported by the latest technical information to enable the expert consenting panel to make informed decisions.
Objective 8: New Zealand's urban environments: 1. support reductions in greenhouse gas emissions; and 2. are resilient to the current and future effects of climate change.	The project will result in an urban environment which support reductions in greenhouse gas emissions. In particular, the project includes new and proposed upgrades to transport infrastructure include walking and cycling facilities and greater walking and cycling connectivity to encourage active transport modes, thereby reducing reliance on and use of cars. The project will also provide for approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 dwellings and 282 hotel rooms within walking and cycling distance of the Drury Central Rail Station (due for completion in 2025). As such, the project will support sustainable transport modes by supporting the development of a Transport Orientated Centre. The project has been designed to maintain flood catchments and areas adjacent to streams and wetlands to reduce risks to communities and people from flood hazards. In particular the project involves the creation of an esplanade reserve and open space incorporating Stream A together with riparian planting proposed to restore and enhance ecological values and indigenous biodiversity. The development has been comprehensively designed to ensure that all buildings will be located outside of floodplains.

Policies	
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) be or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.	The proposal meets Policy 1 for the reasons identified under Objectives 1, 2, 5 and 8. The proposal will deliver a variety of housing choices across the development, this includes dwelling typologies and sizes to meet the needs of different households, with the various typologies shown within the Architectural Drawings as Appendix 6. The accessibility for people between housing, jobs and community services will improve overtime, noting that the project represents the second stage of Drury Centre (refer to assessment against Objective 1 above). As the land within the wider Drury area are developed, commercial development, schools and community services will establish to respond to market demands and inherently improve accessibility for people and communities to these amenities. Consultation with iwi has been undertaken and is ongoing in terms of allowing for Māori to express their cultural traditions. The project provides a high level of internal accessibility, in terms of walking and cycling. The project provides a range of open spaces, all of which are within walking or cycling distance from proposed residential development. The Drury Central Rail Station (due for completion in 2025) is within walking and cycling distance of the commercial, retail and community activities and dwellings and will significantly improve accessibility from the development to Manukau or the City Centre. The development will offer employment opportunities within Stages 1 and 2 of Drury Centre and in addition has good accessibility to employment opportunities in the Drury South industrial area and to State Highway 1 for access to the remainder of Auckland. Stormwater and flooding effects will be adequately managed through design and flood modelling, such that any adverse effects will be minimised, avoided or managed and without adverse impacts to the receiving environment.
Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	Policy 2 requires Tier 2 authorities to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

	The proposal will deliver approximately 102 new dwellings and 292 vacant residential lots, adding to Auckland's development capacity within Drury. Therefore, the proposal will make a significant contribution to realising development capacity through the delivery of homes, and competitive land markets. This will better enable Auckland Council to meet Policy 2. The provision of additional development capacity will also support the future and existing employment areas within the Drury South industrial area and Manukau.
Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable: (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and (b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and (c) building heights of at least 6 storeys within at least a walkable catchment of the following: (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and (d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.	This policy is not applicable as it outlines the changes anticipated under the NPS-UD to regional policy statements and district plans in relation to building heights and density requirements. Therefore, this is not relevant to the proposal or a consent application.
Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only	This policy is not applicable as it relates to changes required to regional policy statements and district plans to enable the relevant building height or density requirements under Policy 3. Therefore, this is not relevant to the proposal or a consent application.

to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area	
Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of: (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (b) relative demand for housing and business use in that location.	This policy is not applicable as Auckland is not a Tier 2 urban environment. In addition, this policy outlines the changes anticipated under the NPS-UD to regional policy statements and district plans with respect to building heights and density in relation to accessibility and demand.
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity (e) the likely current and future effects of climate change.	The area is currently undergoing significant change with the landscape shifting from rural to urban. The development of the land is consistent with the urban zonings under the AUP(OP), the Drury Centre Precinct as well as the Drury-Opaheke Structure Plan and therefore a change in amenity values is expected. The proposal will improve amenity values appreciated by other people, communities and future generations due to the comprehensively planned nature of the project and the variety of housing densities and types enabled by this project. The proposal has been planned and designed to result in well-functioning urban environments, which will have benefits including (but not limited to): (a) Utilising ecologically sensitive design including protection of streams, proposed riparian planting, as well as stormwater treatment to reduce ecological impacts; (b) Improved safety and health of people through permeable street patterns (encouraging walking and cycling) and buildings designed and oriented to provide passive surveillance of public spaces; and (c) Resilience to natural hazards for the reasons set out under Objective 8 above. The likely current and future effects of climate change are assessed under Objective 8 above.

Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.	This policy is not applicable as it relates to local authorities setting housing bottom lines in regional policy statements and district plans. Therefore, this is not relevant to the proposal or a consent application.
Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.	As noted earlier in this assessment, the proposal will be supported by all necessary infrastructure which is either already in place, currently being implemented, or will be fully funded by the applicant to service the proposal. The proposal will significantly add to development capacity with a yield of approximately 102 new dwellings, 292 vacant residential lots, and approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 282 hotel rooms, and will contribute to well-functioning urban environments.
Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must: (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and (d) operate in a way that is consistent with iwi participation legislation	Only subclauses (c) and (d) are of relevance, as subclauses (a) and (b) relate to the preparation of RMA planning documents (such as district plans) and FDSs. While there are no scheduled sites of significance to Māori within the proposal, the applicant is actively engaging and providing opportunities for iwi involvement into the proposal.

Policy 10: Tier 1, 2, and 3 local authorities: (a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and (b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and (c) engage with the development sector to identify significant opportunities for urban development	This policy is not applicable as it sets out expectations for local authorities with respect to implementation of the NPS-UD, engagement with infrastructure providers and the development sector. The proposal is within an area which has already been identified by the development sector and Auckland Council as having significant opportunities for urban development as evidenced by the Drury-Opaheke Structure Plan and the underlying urban zoning.
Policy 11: In relation to car parking: (a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and (b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.	Dwellings within the Stage 2 area will be provided with at least one on-site car park (with the exception of one apartment where no onsite parking is provided). Proposed commercial and office GFA will be provided with carparks to meet the maximum standards as set out within the AUP (OP). Accessible car parks are provided in accordance with the NZS4121-2001 *Design for Access and Mobility – Buildings and Associated Facilities* document.

2.0 National Policy Statement for Freshwater Management 2020

Objective/Policy	Assessment
2.1 Objective	
(1) The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:	The protection and enhancement of the health and well-being water bodies, streams and freshwater ecosystems has been considered through the design of the development. This is evident through the subdivision pattern and development layout which has been purposely located and designed to avoid streams and natural wetlands as far as practicable. However, it was not feasible to retain Stream A wetland and the two eastern tributaries of Stream A due to the

(c) first, the health and well-being of water bodies and freshwater ecosystems (d) second, the health needs of people (such as drinking water) (e) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.	location of Drury Boulevard and this was discussed with mana whenua extensively. The ecological value of Stream A wetland is considered to be low due to its modification while Stream A is considered to be of moderate ecological value, typical of rural streams. The effects of the proposed reclamation are addressed through the creation of new stormwater wetland, daylighting, riparian planting and habitat creation in the lower each of Stream A. Though strictly not meeting the offsetting and compensation principles of the effects management hierarchy, the proposal prioritises the health and well-being of water bodies and freshwater ecosystems. The proposal also provides for people and communities to provide for their social, economic and cultural wellbeing, as well as health and safety, now and into the future, through the provision of additional employment opportunities and retail to meet their needs.
2.2 Policies	
Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.	The proposal is considered to meet Policy 1 as assessed under Objective 1 above and consistent with the hierarchy of obligations in Te Mana o te Wai. In respect of Policy 2, Kiwi Property has engaged extensively with mana whenua and those discussions have addressed freshwater values, restoration of ecological values and stormwater management principles and the applicant has taken on board feedback from tangata whenua into the proposal.
Policy 2: Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.	
Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.	The proposal has been designed with a strong focus on ensuring freshwater is managed in an integrated way, and which considers activities and development on a whole-of-catchment basis. The development adopts a holistic, treatment train approach across the site which begins with stormwater runoff controls at-source (e.g., inert materials), followed by capture and treatment, and then the enhancement of receiving environments to enhance their stormwater management function. This is considered to demonstrate that the freshwater is managed in an integrated and whole-of-catchment manner.
Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.	As explained within the stormwater assessment in Appendices 10 and 11 and flood assessment in Appendix 11, climate change has been considered in all aspects of the stormwater management approach for the site.
Policy 5: Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	The health and well-being of identified degraded freshwater streams and wetlands will be improved through the protection and enhancement of streams and wetlands retained as part of the proposal.

Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	The reclamation of Stream A wetland is assessed under Objective 1 above.
Policy 7: The loss of river extent and values is avoided to the extent practicable.	The reclamation of the two eastern tributaries of Stream A is assessed under Objective 1 above.
Policy 8: The significant values of outstanding water bodies are protected.	N/A – there are no outstanding water bodies on-site.
Policy 9: The habitats of indigenous freshwater species are protected.	The restoration of watercourses on the site will provide for the enhancement and protection of indigenous freshwater species on the site.
Policy 10: The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.	N/A – not relevant to proposal.
Policy 11: Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.	N/A – freshwater allocation is not proposed.
Policy 12: The national target (as set out in Appendix 3) for water quality improvement is achieved.	N/A – no streams/rivers within the site are considered fourth order or greater.
Policy 13: The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.	As identified within Section 9 of the EMP (Appendix 25G), the quality of water bodies and freshwater ecosystems will be monitored overtime to ensure the development and proposed stormwater management approach contributes to reversing deteriorating trends.
Policy 14: Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenges to their health and well-being, is regularly reported on and published.	As above.
Policy 15: Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.	The proposal provides for people and communities to provide for their social, economic and cultural wellbeing, as well as health and safety, now and into the future, through employment opportunities, the delivery of open space areas and approximately 102 dwellings and 292 vacant residential lots which will provide additional housing stock to meet their needs, whilst ensuring that the health and wellbeing of freshwater systems are maintained.

3.0 National Policy Statement for Indigenous Biodiversity

Objective/Policy	Assessment
Objective	
(1) The objective of this National Policy Statement is: (a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and (b) to achieve this: (i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and (iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.	The Ecological Impact Assessment notes that works proposed include extensive riparian and planting and the creation of two new wetlands that are anticipated to contribute to ecological values. The proposed enhancement measures will make a contribution to addressing the critical environmental challenge of national biodiversity loss and degradation. Enhancement planting is proposed throughout the site. This includes the removal of exotic vegetation and planting within proximity to streams. Iwi consultation has been undertaken and tangata whenua recommendations have been incorporated into the proposal. For the reasons noted above it is considered that the proposal will provide for the social, economic and cultural wellbeing of people and communities.
Policies	
Policy 1: Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.	It is considered that the proposal does manage indigenous biodiversity in a way that gives effect to the decision-making principles and takes into account the principles of Treaty of Waitangi by way of the pre-application engagement and on-going hui with the key iwi groups for Drury East.

Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity.	indigenous biodiversity. Iwi is supportive of the proposed riparian and enhancement planting that will be achieved across the proposal as a whole. Iwi will also continue to be engaged and involved with other decision making about indigenous biodiversity across the project by way of developing a cultural narrative framework for Drury East. Engagement with iwi on refining and finalising this cultural narrative framework is ongoing and in that regard is considered to be consistent with Policy 2(c) of the NPS-IB.
Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	The Ecological Impact Assessment has broadly followed the Ecological Impact Assessment Guidelines 2018 (EcIAG) published by the Environmental Institute of Australia and New Zealand.
Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.	It is proposed to undertake riparian planting and increase areas of native biodiversity throughout the site maintaining ecological resilience.
Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	To the extent relevant, indigenous biodiversity has been considered comprehensively across this large development site.
Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.	N/A – the land is not identified as an SNA.
Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	N/A – the land is not identified as an SNA.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	Indigenous biodiversity has been considered and will be enhanced by the proposal. In particular, the values of the identified streams and wetlands will be enhanced through riparian planting. The proposal will also see additional planting along streets and within open space areas.
Policy 9: Certain established activities are provided for within and outside SNAs.	N/A – the site is not identified as an SNA.
Policy 10: Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	The proposal will provide for New Zealand's social, economic, cultural and environmental wellbeing as established further above and in the AEE, while also contributing to indigenous biodiversity for the reasons noted in response to Objective 1 above.

Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.	N/A – not relevant to proposal
Policy 12: Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.	N/A – not relevant to proposal
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	Restoration of existing degraded wetlands and riparian margins is proposed.
Policy 14: Increased indigenous vegetation cover is promoted in both urban and nonurban environments.	The proposed urban environment will see an increase in indigenous vegetation cover through the proposed restoration and enhancement planning.
Policy 15: Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	Areas of vegetation within the subject site have been identified as having the potential to be habitat for indigenous bats, birds and lizards. Several Management Plans are proposed to ensure that effects on indigenous bats, birds, and lizards, and their habitat are managed during construction of the project. The proposed native revegetation planting will result in maintenance of biodiversity over time.
Policy 16: Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.	N/A – not relevant to proposal
Policy 17: There is improved information and regular monitoring of indigenous biodiversity.	N/A – not relevant to proposal

4.0 Auckland Unitary Plan (Operative in Part) – Chapter B Regional Policy Statement

Objective/Policy	Assessment
Chapter B Regional Policy Statement B2.2 Urban Growth and Form - B2.2.1 Objectives	
B2.2.1 Objectives (1) A quality compact urban form that enables all of the following:	The application represents Stages 1 and 2 of a new metropolitan centre on land within the Rural Urban Boundary in Drury. The centre will be established around the fully funded Drury Central Rail Station programmed for completion in the final quarter of 2025. Once completed, Drury

(a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) improved and more effective public transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; and (g) reduced adverse environmental effects.	Centre is projected to deliver approximately 400 new dwellings and directly promote Drury and the wider Auckland south's economy by providing more employment opportunities. Stage 2 of the project will provide approximately 106,00m^2 of commercial, retail, food and beverage, entertainment and community activities as well as 102 dwellings and 282 hotel rooms. A total of 292 vacant residential lots within the Stage 1 area will also be provided under this application. The project will be transformational for Drury's social and cultural vitality as there is an aspiration to develop Drury Centre to be a world-class and sustainable destination where people can work, live and recreate in one location. The civil design report Infrastructure Report confirms that there is adequate capacity in the existing bulk infrastructure to service reticulation demands of the project which, in our view, is considered to represent better and efficient use of existing infrastructure. New local infrastructure within the Centre such as reticulation and roading will all be funded and installed by Kiwi Property. As demonstrated throughout the AEE, the layout and design of the development has been specifically designed to reduce adverse environmental effects.
(2) Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).	The proposed development is within the urban area 2016.
(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.	The proposal will provide approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 dwellings and 282 hotel rooms. A total of 292 vacant residential lots will also be provided.
(4) Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.	The proposed development is within the rural urban boundary.
(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and	As demonstrated in the application material, the development will be integrated and delivered with the required infrastructure upgrades.

villages is integrated with the provision of appropriate infrastructure.	
B2.2.2 Policies	
(1) Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' proposed growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.	The application area is within the Rural Urban Boundary.
(2) Ensure the location or any relocation of the Rural Urban Boundary identifies land suitable for urbanisation in locations that: (a) promote the achievement of a quality compact urban form (b) enable the efficient supply of land for residential, commercial and industrial activities and social facilities; (c) integrate land use and transport supporting a range of transport modes; (d) support the efficient provision of infrastructure; (e) provide choices that meet the needs of people and communities for a range of housing types and working environments; and (f) follow the structure plan guidelines as set out in Appendix 1; while: (g) protecting natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua,	N/A – site is located within Rural Urban Boundary

natural resources, coastal environment, historic heritage and special character; (h) protecting the Waitākere Ranges Heritage Area and its heritage features; (i) ensuring that significant adverse effects from urban development on receiving waters in relation to natural resource and Mana Whenua values are avoided, remedied or mitigated; (j) avoiding elite soils and avoiding where practicable prime soils which are significant for their ability to sustain food production; (k) avoiding mineral resources that are commercially viable; (l) avoiding areas with significant natural hazard risks and where practicable avoiding areas prone to natural hazards including coastal hazards and flooding; and (m) aligning the Rural Urban Boundary with: (i) strong natural boundaries such as the coastal edge, rivers, natural catchments or watersheds, and prominent ridgelines; or (ii) where strong natural boundaries are not present, then other natural elements such as streams, wetlands, identified outstanding natural landscapes or features or significant ecological areas, or human elements such as property boundaries, open space, road or rail boundaries, electricity transmission corridors or airport flight paths.	

(3) Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.	N/A – site is live zoned as Business - Metropolitan Centre and Business - Mixed-Use.
(4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.	The proposed development is within the urban area 2016.
(5) Enable higher residential intensification: (a) in and around centres; (b) along identified corridors; and (c) close to public transport, social facilities (including open space) and employment opportunities.	The proposal will deliver residential dwellings at higher densities within walkable and cyclable distance to the Drury Centre and the Drury Central Rail Station. The proposal is within proximity to State-Highway 1. The site will provide open space areas and will provide connection to Hingaia Reserve. The area is near existing employment opportunities such as Drury South Industrial Area, and planned employment opportunities including Drury Centre. Overall, it is considered that the proposed density is appropriate when having regard to the characteristics of the land.
(6) Identify a hierarchy of centres that supports a quality compact urban form: (a) at a regional level through the city centre, metropolitan centres and town centres which function as commercial, cultural and social focal points for the region or sub-regions; and (b) at a local level through local and neighbourhood centres that provide for a range of activities to	The proposal will provide for Part Stage 1 and Stage 2 of the Drury Centre.

support and serve as focal points for their local communities.	
(7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following: (a) support a quality compact urban form; (b) provide for a range of housing types and employment choices for the area; (c) integrate with the provision of infrastructure; and (d) follow the structure plan guidelines as set out in Appendix 1.	N/A – the site is zoned as Metropolitan Centre and Mixed-Use.
(8) Enable the use of land zoned future urban within the Rural Urban Boundary or other land zoned future urban for rural activities until urban zonings are applied, provided that the subdivision, use and development does not hinder or prevent the future urban use of the land.	N/A – site is not zoned Future Urban.
(9) Apply a Rural Urban Boundary for Waiheke Island (identified in Appendix 1B) as a regional policy statement method.	N/A – not relevant to proposal
B2.3 A quality built environment B.2.3.1 Objectives	
(1) A quality built environment where subdivision, use and development do all of the following:	It is considered that the development will result in a quality-built environment. The development has been designed to respond to the intrinsic qualities and physical characteristics of the site, including natural watercourses, waterbodies, and open space.

(a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.	The proposal will deliver Part Stage 1 and Stage 2 of Drury Centre, an integrated, sustainable and transit oriented metropolitan centre to be established around the fully funded Drury Central Rail Station. Approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms are proposed. In addition, 292 vacant residential lots are also proposed within the original 13 residential super lots previously consented as part of Stage 1. The development will be located within close proximity to SH1 and will improve access to and from other Drury developments centres via the construction of internal road network within the site, and other connections, increasing transport efficiency. The dwellings will be of varying typologies, providing for a mixture of choice and price for people within Drury. With respect to the vacant lots, the general size and shape of the lots proposed ensures that there will be sufficient flexibility to deliver a range of quality building types and densities consistent with the expectations of the AUP zoning and precinct. It is also noted that any future development across these vacant lots could occur across multiple lots, enabling larger and higher intensity building forms to be accommodated. The proposal will incorporate existing infrastructure and provide new infrastructure where necessary. The development has been comprehensively designed to ensure that all dwellings will be located sufficiently outside of floodplains, with sufficient freeboard and 3.8° climate change taken into account. Roads will be located outside of floodplains.
(2) Innovative design to address environmental effects is encouraged.	The overall layout and design of the development (in terms of roads, lots and open spaces) has been designed to address environmental effects. In particular, setbacks are proposed around natural waterbodies to protect these from the adverse effects of development, as well as to provide flood capacity to protect people from adverse natural flooding hazards.
(3) The health and safety of people and communities are promoted.	The proposed configuration provides for an urban block structure with clear and direct links. The proposed development provides for the health and safety and people and communities as it has been designed with Crime Prevention Through Environmental Design (CPTED) principles in mind. Dwellings have been designed with glazing and living areas facing street and public areas to provide for passive surveillance. Fences adjacent to reserves are only 1.2m in height to provide

	opportunities for passive surveillance. Pedestrian access ways will be well-lit to support safe movement. These are considered to promote the health and safety of people and communities.
B2.3.2 Policies	
(1) Manage the form and design of subdivision, use and development so that it does all of the following: (a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage; (b) contributes to the safety of the site, street and neighbourhood; (c) develops street networks and block patterns that provide good access and enable a range of travel options; (d) achieves a high level of amenity and safety for pedestrians and cyclists; (e) meets the functional, and operational needs of the intended use; and (f) allows for change and enables innovative design and adaptive re-use.	Refer to assessment in relation to B2.3.1(1) and B2.3.1(3) above, and in the Urban Design Assessment at **Appendix 14**. In addition, the development has a street pattern that has considered the site constraints, including maintaining and protecting natural watercourses and wetlands where practicable. The street pattern provides access to the commercial, retail and community buildings, parks and dwellings, and enables a range of travel options through the accessways proposed throughout the development. A high level of amenity and safety for pedestrians and cyclists is provided in the proposed roading design, which incorporates generous footpaths, cycleways and landscaping. The development provides for a varied form and design, which meets the functional and operational needs of the anticipated urban area and which supports the anticipated built form of the Metropolitan Centre and Mixed-Use zones.
(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following: (a) providing access for people of all ages and abilities;	The development has been designed to promote the health, safety and well-being of people and communities as multiple modes of transport are provided for in the development, including walking, cycling, and cars (where required). The street layout and pattern has been designed to allow a high level of permeability for walking and cycling to encourage active transport methods.

(b) enabling walking, cycling and public transport and minimising vehicle movements; and (c) minimising the adverse effects of discharges of contaminants from land use activities (including transport effects) and subdivision.	With regard to the proposed stormwater discharge, it is considered by Woods that proposed retention and detention, private wetlands and raingardens will provide water quality mitigation to meet the water quality treatment requirements in accordance with GD01.
(3) Enable a range of built forms to support choice and meet the needs of Auckland's diverse population.	The application will deliver part Stage 1 and Stage 2 of the Drury Centre development, which provides a range of built forms and uses. Residential subdivision in Stage 1 will include a range of lot sizes, providing for potentially varied typologies and layouts to support choice. Stage 2 will provide for residential apartment blocks and terraced housing. Overall, this proposal will contribute towards meeting the needs of Auckland's diverse population.
(4) Balance the main functions of streets as places for people and as routes for the movement of vehicles.	The street network has been designed as places which balance both people and vehicular movement through the proposed carriageway widths and provision of walking and cycling facilities.
(5) Mitigate the adverse environmental effects of subdivision, use and development through appropriate design including energy and water efficiency and waste minimisation.	The proposed stormwater management approach for the development includes water sensitive design such as bioretention devices.
B2.4 Residential Growth B2.4.1 Objectives	
(1) Residential intensification supports a quality compact urban form.	The proposal is considered to meet this policy for the reasons set out under objective B2.2.1(1) above.
(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.	The proposal will result in a residential environment which is attractive through the well-designed dwellings and variation proposed throughout the site, and through the retention and enhancement of natural features throughout the site, such as streams, wetlands and native vegetation. The good level of walking and cycling permeability throughout the development encourages active transport modes to contribute to the health of residents. The development is considered to result in safe residential areas.
(3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities	The development is adjacent to Waihoehoe Road and the Opaheke North-South Road (both planned arterial roads) and proximate to the funded and consented Drury Central Rail Station.

(including open space) or employment opportunities is the primary focus for residential intensification.	Medium to high density residential development will occur within Stage 2, which is within the Drury Town Centre.
(4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population.	The residential development includes a range of dwelling sizes, typologies and layouts to support choice, with a variety of dwellings proposed, providing for a mixture of choice and price for people within Drury.
(5) Non-residential activities are provided in residential areas to support the needs of people and communities.	A variety of non-residential activities including commercial, retail, community and open space areas within Drury Centre will support the needs of people within Drury and the nearby Drury East and Waihoehoe developments.
(6) Sufficient, feasible development capacity for housing is provided, in accordance with Objectives 1 to 4 above, to meet the targets in Table B2.4.1	The proposal will deliver 102 new dwellings and 292 vacant residential lots to provide capacity in an area where there is demand for housing. The area is near existing employment opportunities such as Drury South Industrial Area, and Manukau.
B2.4.2 Policies	
(1) Provide a range of residential zones that enable different housing types and intensity that are appropriate to the residential character of the area.	The proposal will provide for a range of dwelling sizes, typologies and layouts to support choice, with a variety of dwellings of varying levels proposed. The proposed typologies, being provided at a medium to high density within the Drury Centre, are considered to be appropriate in the context of the underlying Metropolitan Centre zoning.
(2) Enable higher residential intensities in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space.	A higher residential intensity will be provided for within the Drury Centre, which is within close proximity to the public transport network including the Drury Central Rail Station, and a variety of commercial, retail, community activities and open space.
(3) Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.	The proposal will provide medium to high density residential development with reasonable walking access to the Drury Central Rail Station, open space, and in proximity to neighbouring suburban areas and centres.
(4) Provide for lower residential intensity in areas: (a) that are not close to centres and public transport;	N/A – it is considered that the proposal has been designed to medium to high intensity standards as reflected in the outcomes sought for the Metropolitan Centre and Mixed-Use zones.

(b) that are subject to high environmental constraints; (c) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; and (d) where there is a suburban area with an existing neighbourhood character.	
(5) Avoid intensification in areas: (a) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character; or (b) that are subject to significant natural hazard risks; where such intensification is inconsistent with the protection of the scheduled natural or physical resources or with the avoidance or mitigation of the natural hazard risks.	There are no natural or physical resources on the site that have been scheduled in the AUP (OP) in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character. Whilst there are natural flood hazards present on the site, development within this area has been avoided. As confirmed in the application material, all applicable natural hazards can be avoided or mitigated to an acceptable degree.
(6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.	The development will be adequately serviced by infrastructure, which will be provided prior to or at the same time as the delivery of development.
(7) Manage adverse reverse sensitivity effects from urban intensification on land with existing incompatible activities.	Reverse sensitivity effects are not anticipated to occur in relation to existing rural activities or infrastructure, as the wider environment currently undergoing significant change with the landscape shifting from rural to urban.

(8) Recognise and provide for existing and planned neighbourhood character through the use of place-based planning tools.	The proposal has been comprehensively masterplanned through the Drury-Opaheke Structure Plan 2019, resulting in a neighbourhood character that is appropriate to the site and responds to adjoining development.
(9) Manage built form, design and development to achieve an attractive, healthy and safe environment that is in keeping with the descriptions set out in placed-based plan provisions.	The proposal is considered to achieve an attractive, healthy and safe urban environment that is considerate of the existing natural environment.
(10) Require non-residential activities to be of a scale and form that are in keeping with the existing and planned built character of the area.	Non-residential Metropolitan Centre activities, including commercial, community, retail and open-space have been designed to service the needs of the wider Drury developments, responding to the planned built character of the area. They are considered be of a scale and form that is anticipated by the underlying zoning.
(11) Enable a sufficient supply and diverse range of dwelling types and sizes that meet the housing needs of people and communities, including: (a) households on low to moderate incomes; and (b) people with special housing requirements.	This policy is considered to be met for the reasons set out under policy B2.3.2(3).
B2.5 Commercial and Industrial Growth B2.5.1 Objectives	
(1) Employment and commercial and industrial opportunities meet current and future demands.	The proposal will deliver approximately 106,00m^2 of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms. A total of 7,750 FTE years of employment is anticipated to be generated during the development phase. Further, long-term employment in the operation and maintenance of the Metropolitan Centre will deliver a regionally significant economic benefit for the Drury and wider South Auckland area by providing significant employment opportunities within the metropolitan centre. The development of the centre as a vibrant and attractive location is anticipated to generate increased demand for housing and ongoing employment opportunities within the area.
(2) Commercial growth and activities are primarily focussed within a hierarchy of centres and identified	The proposal represents Stage 2 of the metropolitan centre. The land has been identified as a large centre within the Drury - Opaheke Structure Plan and the AUP specifically contemplates the development of new Metropolitan Centre in this location by way of the Drury Centre Precinct.

growth corridors that contribute to a well-functioning urban environment and a compact urban form.	
(2A) Commercial and industrial activities are resilient to the effects of climate change.	All proposed buildings will be located outside of flood plains.
(3) Industrial growth and activities are enabled in a manner that does all of the following: (a) promotes economic development; (b) promotes the efficient use of buildings, land and infrastructure in industrial zones; (c) manages conflicts between incompatible activities; (d) recognises the particular locational requirements of some industries; and (e) enables the development and use of Mana Whenua's resources for their economic well-being.	N/A – industrial activities are not proposed.
B2.5.2 Policies	
(1) Encourage commercial growth and development in the city centre, metropolitan and town centres, and enable retail activities on identified growth corridors, to provide the primary focus for Auckland's commercial growth.	This policy is considered to be met for the reasons set out under objective B2.5.1(2).
(2) Support the function, role and amenity of centres by encouraging commercial and residential activities within centres, ensuring development that locates within centres contributes to a well-functioning urban environment and the following:	The project will deliver Part Stage 1 and Stage 2 of Drury Centre, an integrated, sustainable and transit oriented metropolitan centre to be established around the Drury Central Rail Station. Once completed, Drury Centre is projected to deliver approximately 400 new dwellings and directly promote Drury and the wider Auckland south's economy by providing more employment opportunities. Drury Centre to be a world-class and sustainable destination where people can

• a high-density urban form that responds to a centre's accessibility by public transport, commercial activity and community facilities; • an attractive and efficient urban environment with a distinctive sense of place and quality public places; • a diverse range of activities, with the greatest mix, concentration and density of activities in the city centre; • a distribution of centres that provide for the needs of people and communities; • employment and commercial opportunities; • a character and form that supports the role of centres as focal points for communities and compact mixed-use environments; • the efficient use of land, buildings and infrastructure; • high-quality street environments including pedestrian and cycle networks and facilities; • development does not compromise the ability for mixed use developments, or commercial activities to locate and expand within centres; and • a scale and form of development that is necessary to achieve any relevant identified qualifying matters.	work, live and recreate in one location that acts as a focal point for the Drury and wider southern Auckland Communities. The block structure is configured to create a well-connected street layout, linking Drury Centre to the wider network and the future Drury Centre Train Station to the north. The proposal will provide an attractive street environment which is designed to positively contribute to pedestrian amenity and safety. The proposed layout is considerate of the existing landform, with Valley Park proposed to incorporate the riparian margins of Stream A. Valley Park will act as a focal point for activity within the centre of the site. Its integration with the Town Square and Stream A will assist in creating a well-connected movement network as well as provide for activity and a high-level of amenity. Hingaia Reserve will be retained as an open space area, with recreational walkways within the Reserve proposed. Proposed buildings will positively address and engage with the street. Fine-grain retail, commercial and residential uses are proposed at heights and densities that are considered to support the function of the Drury Centre and Drury Central Rail Station. Fine grain retail and commercial activities are proposed within Lots A, B, D, and E, and have been strategically located to create a strong edge and frame Hotiki Road. The fine grain retail is oriented to face Hotiki Road with legible and accessible entryways at ground floor. The proposal includes approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms. In addition, 292 vacant residential lots are also proposed within the original 13 residential superlots previously consented as part of Stage 1.
(3) Enable the expansion of metropolitan and town centres having regard to whether it will do all of the following: • improve access to a range of facilities, goods and services in a convenient and efficient manner;	N/A the proposal is Stage 2 of a new Metropolitan Centre, not expand an existing centre.

• maintain or enhance a compact mixed-use environment in the centre; • retain or enhance the existing centre's function, role and amenity; • support the existing network of centres and achieve a sustainable distribution of centres that is supported by sufficient population growth; • manage adverse effects on the function, role and amenity of the city centre, and other metropolitan and town centres, beyond those effects ordinarily associated with trade effects on trade competitors; • avoid, remedy or mitigate the effects of commercial activity on adjoining land uses; • support medium to high intensity residential development; and • support a safe and efficient transport system which is integrated with the centre.	
(4) Enable new metropolitan, town and local centres which contribute to a well-functioning urban environment following a structure planning process and plan change process in accordance with Appendix 1 Structure plan guidelines, having regard to all of the following: • the proximity of the new centre to existing or planned medium to high intensity residential development; • the existing network of centres and whether there will be sufficient population growth to achieve a sustainable distribution of centres; • whether the new centre will avoid or minimise adverse effects on the function, role and amenity of the city centre, metropolitan and town centres, beyond those	The proposal will deliver the Drury Metropolitan Centre. The Drury - Opaheke Structure Plan was undertaken in accordance with Appendix 1 Structure plan guidelines, and identified the need for a large centre within Drury to service the amount of growth envisaged for the wider Drury area. The Structure Plan identified the subject site as comprising this centre to service growth. The development of the site as a comprehensively designed master-planned centre, providing commercial, retail, food and beverage, entertainment and community activities, visitor accommodation, open spaces and a town square, as well as residential units, in general accordance with the Drury Centre Precinct Plans, will ensure consistency with these policies.

effects ordinarily associated with trade effects on trade competitors; • the form and role of the proposed centre; • any significant adverse effects on existing and planned infrastructure; • a safe and efficient transport system which is integrated with the centre; and • any significant adverse effects on the environment or on natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage special character, or other identified qualifying matter.	
(5) Enable retail activities, where appropriate, on identified growth corridors in business zones, having regard to all of the following: • adverse effects on the function, role and amenity of the city centre, metropolitan and town centres, beyond those effects ordinarily associated with trade effects on trade competitors; • adverse effects on the quality compact urban form including the existing and planned location of activities, facilities, infrastructure and public investment; • effects on community social and economic wellbeing and accessibility; • the efficient use and integration of land and infrastructure; • effects on the safe and efficient operation of the transport network;	Fine-grain retail and commercial uses are proposed at heights and densities that are considered to support the function of the Drury Centre and Drury Central Rail Station. Fine grain retail and commercial activities have been strategically located to create a strong edge and frame Hotiki Road. The fine grain retail is oriented to face Hotiki Road with legible and accessible entryways at ground floor. LFR activities and multi-storey carparks have been strategically located at the centre of the blocks and are sleeved by finer grain retail activities to help break up the built form and increase activity and movement along the street edge. The UDA, provided as Appendix 14, considers that the proposed development appropriately balances good built form and amenity outcomes with the operational and access requirements needed to provide a functional and attractive environment, and will be well connected both internally and to surrounding amenities.

• effects of the development on the efficient use of any industrial land, in particular opportunities for land extensive industrial activities and heavy industry; • avoiding conflicts between incompatible activities; and • the effects on residential activity.	
(6) Enable commercial activities, where appropriate, in business zones in locations other than the city centre, metropolitan and town centres and identified growth corridors, having regard to all of the following: • (a) the matters listed in Policy B2.5.2(5)(a) to Policy B2.5.2(5)(h) above; • (b) the extent to which activities would compromise the achievement of policies B2.5.2(1) and B.2.5.2(2): and • (c) the extent to which activities would compromise the hierarchy of locations identified in policies B2.5.2(1) to B.2.5.2(5).	This policy is considered to be met for the reasons outlined within B2.5.2(5) above.
(7) Enable the supply of land for industrial activities, in particular for land-extensive industrial activities and for heavy industry in areas where the character, scale and intensity of the effects from those activities can be appropriately managed.	N/A – industrial activities not proposed.
(8) Enable the supply of industrial land which is relatively flat, has efficient access to freight routes, rail or freight hubs, ports and airports, and can be efficiently served by infrastructure.	N/A – industrial activities not proposed.
(9) Enable the efficient use of industrial land for industrial activities and avoid incompatible activities by all of the following:	N/A – industrial activities not proposed.

• (a) limiting the scale and type of non-industrial activities on land zoned for light industry; • (b) preventing non-industrial activities (other than accessory activities) from establishing on land zoned for heavy industry; and • (c) promoting co-location of industrial activities to manage adverse effects and to benefit from agglomeration.	
(10) Manage reverse sensitivity effects on the efficient operation, use and development of existing industrial activities, including by preventing inappropriate sensitive activities locating or intensifying in or adjacent to heavy industrial zones.	N/A – significant distancing is provided from the nearest industrial activities and zones such that no reverse sensitivity effects are considered to arise.
(10A) Require commercial, retail and industrial activities to be located, designed and developed with best practice resilience to the effects of climate change.	All proposed buildings will be located outside of any flood plain.
B2.7 Open space and recreation facilities B2.7.1 Objectives	
(1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.	Various open spaces are proposed to meet the amenity and informal recreational needs of people and communities both within the Drury Centre area, but also the wider Drury development area. Connection will be provided to Hingaia Reserve at the west of the application area. A significant open space is proposed within the centre of the Stage 2 area. Proposed open spaces will provide areas for informal recreation. The proposal delivers a good level of recreational amenity. The integration of planting with walkways and passive recreation spaces supports both structured and informal activities, creating a diverse and engaging landscape experience.
(2) Public access to and along Auckland's coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced.	The proposal enhances public access to watercourses and waterbodies through the paths proposed within Hingaia Reserve. A 20m wide esplanade reserve will also be established and vested with Auckland Council which will ensure public access is maintained.

(3) Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.	Neighbouring land uses adjacent to proposed open space areas will be a variety of commercial, community, retail and dwellings – no reverse sensitivity effects anticipated.
B2.7.2 Policies	
(1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.	This policy is considered to be met for the reasons set out under objective B2.7.1(1).
(2) Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.	Landscaping and enhancement of streams, and connection to the Hingaia Reserve will promote the physical connection of open spaces for people and wildlife within the development.
(3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.	This policy is considered to be met for the reasons set out under objective B2.7.1(1).
(4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.	Several open spaces are proposed throughout the development. Passive recreation facilities are also provided through the provision of walkways within the site. The integration of planting with walkways and passive recreation spaces supports both structured and informal activities, creating a diverse and engaging landscape experience.
(5) Enable the development and use of existing and new major recreation facilities.	N/A – no major recreation facilities proposed and are not considered appropriate for the area.
(6) Encourage major recreation facilities in locations that are convenient and accessible to people and communities by a range of transportation modes.	N/A – no major recreation facilities proposed and are not considered appropriate for the area.
(7) Encourage major recreation facilities in locations that are convenient and accessible to people and communities by a range of transportation modes.	N/A – no major recreation facilities proposed and are not considered appropriate for the area.

(8) Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities.	It is not considered that the use of open spaces will produce adverse effects on nearby residents and communities.
(9) Enable public access to lakes, rivers, streams, wetlands and the coastal marine area by enabling public facilities and by seeking agreements with private landowners where appropriate.	Public access will be provided within Hingaia Reserve via the vesting of the esplanade reserve.
(10) Limit public access to and along the coastal marine area, lakes, rivers, streams and wetlands by esplanade reserves, esplanade strips or other legal mechanisms where necessary for health, safety or security reasons or to protect significant natural or physical resources.	N/A – not relevant to proposal.
B3 Infrastructure, transport and energy B3.2.1 Objectives	
(1) Infrastructure is resilient, efficient and effective.	The proposed infrastructure is considered to be resilient, efficient and effective in servicing the proposed development.
(2) The benefits of infrastructure are recognised, including: (a) providing essential services for the functioning of communities, businesses and industries within and beyond Auckland; (b) enabling economic growth; (c) contributing to the economy of Auckland and New Zealand; (d) providing for public health, safety and the well-being of people and communities; (e) protecting the quality of the natural environment; and	The proposed infrastructure will provide for the functioning of a new community, enable economic growth and provide for the health, safety and well-being of people and communities.

(f) enabling interaction and communication, including national and international links for trade and tourism.	
(3) Development, operation, maintenance, and upgrading of infrastructure is enabled, while managing adverse effects on: (a) the quality of the environment and, in particular, natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; (b) the health and safety of communities and amenity values.	The provision of new infrastructure and necessary connections to existing bulk infrastructure will not have adverse effects on the quality of the environment or the health and safety of the community and amenity values.
(4) The functional and operational needs of infrastructure are recognised.	Infrastructure will be provided in a safe and effective manner that will ensure it continues to function and operate appropriately
(5) Infrastructure planning and land use planning are integrated to service growth efficiently.	Infrastructure to service the development has been planned as part of this project to ensure integration. The development provides for roading infrastructure that can safely support the movement of people, goods and services in an efficient and effective manner and have been designed to integrate with the wider transport network including those roads that are planned to be upgraded as part of Stage 1 consent.
(6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.	Infrastructure has been designed to service the proposed development, ensuring compatibility. The National Grid Corridor overlay only applies to very westernmost portion of land in the project area. This policy is considered to be met for the reasons set out under policy B3.2.1(7).
(7) The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance and upgrading are enabled.	No development as part of the Drury Centre will be located within the National Grid Corridor overlay.

(8) The adverse effects of infrastructure are avoided, remedied or mitigated.	Infrastructure will be designed to serve the proposed development and is not considered to produce adverse effects.
B3.2.2 Policies	
(1) Enable the efficient development, operation, maintenance and upgrading of infrastructure.	Development of roads (infrastructure) is proposed to service the development. Several options for infrastructure have been considered and the proposed servicing strategy is considered to be the most efficient.
(2) Recognise the value of investment in existing infrastructure.	Existing infrastructure will be utilised where possible.
(3) Provide for the locational requirements of infrastructure by recognising that it can have a functional or operational need to be located in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.	N/A – not relevant to proposal
(4) Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure.	The proposed development is not considered to produce adverse effects on the infrastructure that is planned to serve it.
(5) Ensure subdivision, use and development do not occur in a location or form that constrains the development, operation, maintenance and upgrading of existing and planned infrastructure.	The proposed development is not considered to result in adverse effects on the infrastructure that is proposed to serve it, nor on the existing infrastructure, which has been considered and utilised where possible as part of the servicing strategy. New infrastructure proposed where required to service the development.
(6) Enable the development, operation, maintenance and upgrading of infrastructure in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character while ensuring that the adverse effects on the values of such areas are	N/A – not relevant to proposal

avoided where practicable or otherwise remedied or mitigated.	
(7) Encourage the co-location of infrastructure and the shared use of existing infrastructure corridors where this is safe and satisfies operational and technical requirements.	Existing infrastructure will be utilised or upgraded where possible. New infrastructure will satisfy operational and technical requirements. It is noted that there will be services such as stormwater, water and wastewater pipes co-located within the roading network.
(8) Avoid, remedy or mitigate the adverse effects from the construction, operation, maintenance or repair of infrastructure.	It is not considered that the proposed construction and operation of infrastructure will have adverse effects.
(9) Ensure where there is a functional or operational need for infrastructure to locate in areas subject to natural hazards: (a) that buildings accommodating people are located and/or designed to minimise risk from natural hazards; and (b) that risk that cannot be avoided by location or design should be mitigated to the extent practicable.	Buildings accommodating people will not be located within areas affected by natural hazards. Location of infrastructure within areas affected by natural hazards has been minimised where possible.
B3.3.1 Transport Objectives	
(1) Effective, efficient and safe transport that: (a) supports the movement of people, goods and services; (b) integrates with and supports a quality compact urban form; (c) enables growth; (d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity	The proposed roading infrastructure as part of this development supports the movement of people, goods and services, integrates with and supports a quality compact urban form, enables growth and facilitates transport choices, in an effective, efficient and safe way. Effective pedestrian and cycle routes are provided for within the development, and pedestrian and cycle connections are provided to land uses and amenities outside of the development.

values and the health and safety of people and communities; and (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.	
B3.3.2 Transport Policies	
(1) Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.	The proposed transport network supports the movement of people, integrates with and support a quality compact urban form and enables urban growth in this location. The proposed transport infrastructure facilitates transport choice.
(2) Enable the movement of people, goods and services and ensure accessibility to sites.	Effective pedestrian and cycle routes are provided for within the development, and pedestrian and cycle connections are provided to land uses and amenities outside of the development.
(3) Identify and protect existing and future areas and routes for developing Auckland's transport infrastructure.	
(4) Ensure that transport infrastructure is designed, located and managed to: (a) integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and (b) provide effective pedestrian and cycle connections.	
(5) Improve the integration of land use and transport by: (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth; (b) encouraging land use development and patterns that reduce the rate of growth in demand for	

private vehicle trips, especially during peak periods; (c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes; (d) requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network; (e) enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.	
(6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects.	
(7) Avoid, remedy or mitigate the adverse effects associated with the construction or operation of transport infrastructure on the environment and on community health and safety	
B6 Mana Whenua B6.2.1 Objectives	

(1) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised and provided for in the sustainable management of natural and physical resources including ancestral lands, water, air, coastal sites, wāhi tapu and other taonga.	The unique relationship between Mana Whenua and natural and physical resources have been recognised. The applicant has consulted with Mana Whenua on the proposal. Section 9 of the AEE provides a summary of all the consultation that has occurred to date with the relevant iwi authorities and Kiwi Property continues to actively engage with the Drury East Mana Whenua Group on the development and cultural narrative for Drury Centre to honour its cultural history.
(2) The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes.	The proposal gives effect to objectives B6.2.1(1) and (2) and policy B6.2.2(1) due to the extensive consultation and engagement with Mana Whenua groups that have occurred to date. It is considered that this process also gives effect to policy B6.2.2(1) in terms of providing the opportunity for Mana Whenua to actively participate in the sustainable management of natural and physical resources, and building and maintaining partnerships and relationships with iwi authorities. The project also gives effect to objective B6.3.1(2), particularly in relation to the natural resource of freshwater, and enhancing this overall with the proposed riparian planting with native species.
(3) The relationship of Mana Whenua with Treaty Settlement Land is provided for	N/A – site is not part of Treaty Settlement Land
(4) The development and use of Treaty Settlement Land is enabled in ways that give effect to the outcomes of Treaty settlements.	N/A – site is not part of Treaty Settlement Land
B6.2.2 Policies	
(1) Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following: (a) recognises the role of Mana Whenua as kaitiaki and provides for the practical expression of kaitiakitanga; (b) builds and maintains partnerships and relationships with iwi authorities;	The unique relationship between Mana Whenua and natural and physical resources have been recognised. The applicant has, through various hui, consulted with Mana Whenua on the proposal. The proposal gives effect to objectives B6.2.1(1) and (2) and policy B6.2.2(1) due to the extensive consultation and engagement with Mana Whenua groups that have occurred to date. It is considered that this process also gives effect to policy B6.2.2(1) in terms of providing the opportunity for Mana Whenua to actively participate in the sustainable management of natural and physical resources, and building and maintaining partnerships and relationships with iwi authorities.

(c) provides for timely, effective and meaningful engagement with Mana Whenua at appropriate stages in the resource management process, including development of resource management policies and plans; (d) recognises the role of kaumātua and pūkenga; (e) recognises Mana Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga; (f) acknowledges historical circumstances and impacts on resource needs; (g) recognises and provides for mātauranga and tikanga; and (h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.	The project also gives effect to objective B6.3.1(2), particularly in relation to the natural resource of freshwater, and enhancing this overall with the proposed riparian planting with native species.
(2) Recognise and provide for all of the following matters in resource management processes, where a proposal affects land or resources subject to Treaty settlement legislation: (a) the historical association of the claimant group with the area, and any historical, cultural or spiritual values associated with the site or area; (b) any relevant memorandum of understanding between the Council and the claimant group; (c) any joint management and cogovernance arrangements established under Treaty settlement legislation; and	

(d) any other specific requirements of Treaty settlement legislation.	
(3) Where Mana Whenua propose an activity on Treaty Settlement Land, the benefits for the wider community and environment provided by any property specific protection mechanism, such as a covenant, shall be taken into account when considering the effects of the proposal.	N/A – The subject site is not Treaty Settlement Land
(4) Enable the subdivision, use and development of land acquired as commercial redress for social and economic development.	N/A – redress is not relevant to application
(5) Enable Mana Whenua to access, manage, use and develop cultural redress lands and interests for cultural activities and accessory activities.	N/A – redress is not relevant to application
B6.3 Recognising Mana Whenua values	
(1) Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision making.	The unique relationship between Mana Whenua and natural and physical resources have been recognised. The applicant has consulted with Mana Whenua on the proposal. Section 9 of the AEE provides a summary of all the consultation that has occurred to date with the relevant iwi authorities and Kiwi Property continues to actively engage with the Drury East Mana Whenua Group on the development and cultural narrative for Drury Centre to honour its cultural history. The proposal gives effect to objectives B6.2.1(1) and (2) and policy B6.2.2(1) due to the consultation and engagement with Mana Whenua groups that have occurred to date. It is considered that this process also gives effect to policy B6.2.2(1) in terms of providing the opportunity for Mana Whenua to actively participate in the sustainable management of natural and physical resources, and building and maintaining partnerships and relationships with iwi authorities. The project also gives effect to objective B6.3.1(2), particularly in relation to the natural resource of freshwater, and enhancing this overall with the proposed wetland and riparian planting with native species.
(2) The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall.	
(3) The relationship of Mana Whenua and their customs and traditions with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, natural resources or historic heritage values is recognised and provided for.	
B6.3.2 Policies	

(1) Enable Mana Whenua to identify their values associated with all of the following: (a) ancestral lands, water, air, sites, wāhi tapu, and other taonga; (b) freshwater, including rivers, streams, aquifers, lakes, wetlands, and associated values; (c) biodiversity (d) historic heritage places and areas; and (e) air, geothermal and coastal resources.	
(2) Integrate Mana Whenua values, mātauranga and tikanga: (a) in the management of natural and physical resources within the ancestral rohe of Mana Whenua, including: (i) ancestral lands, water, sites, wāhi tapu and other taonga; (ii) biodiversity; and (iii) historic heritage places and areas. (b) in the management of freshwater and coastal resources, such as the use of rāhui to enhance ecosystem health; (c) in the development of innovative solutions to remedy the longterm adverse effects on historical, cultural and spiritual values from discharges to freshwater and coastal water; and	

(d) in resource management processes and decisions relating to freshwater, geothermal, land, air and coastal resources.	
(3) Ensure that any assessment of environmental effects for an activity that may affect Mana Whenua values includes an appropriate assessment of adverse effects on those values.	Mana whenua values can only be assessed by Mana Whenua. While the project will impact Stream A and the Stream A wetland, a series of alternative options were considered by the project team prior to proceeding with the proposed design which takes into account mana whenua priorities identified during regular hui with the Drury East Mana Whenua Group. The lower reach of Stream A will also be daylighted, restored and enhanced as part of the project with riparian planting to a minimum of 10m on both sides of streams, and an Ecological Management Plan is proposed as a condition of consent. These enhancements are considered to improve and enhance the mauri of freshwater and aligned with mana whenua values, notwithstanding that there will be a net loss in ecological values. In addition, water-sensitive design providing stormwater quality treatment of contaminants prior to discharge will also contribute to improving water quality and will again enhance the mauri of freshwater. Overall, on the basis that the relevant iwi authorities consulted have not expressed strong objection to the project and the ecological enhancements proposed are aligned with mana whenua values, it is considered that adverse effects on cultural values will be avoided or mitigated and the overall the effects will be positive.
(4) Provide opportunities for Mana Whenua to be involved in the integrated management of natural and physical resources in ways that do all of the following: (a) recognise the holistic nature of the Mana Whenua world view; (b) recognise any protected customary right in accordance with the Marine and Coastal Area (Takutai Moana) Act 2011; and (c) restore or enhance the mauri of freshwater and coastal ecosystems.	As noted above, the applicant has actively engaged and consulted with Mana Whenua. The holistic nature of the Mana Whenua world view and opportunities to enhance the mauri of freshwater ecosystems has been taken into account in the proposed development. There are no protected customary rights in accordance with the Marine and Coastal Area (Takutai Moana) Act 2011.
(5) Integrate Mana Whenua values, mātauranga and tikanga when giving effect to the National Policy	This policy is considered to be met for the reasons assessed under policies 2 and 3 of the NPS-FM.

Statement on Freshwater Management 2014 in establishing all of the following: (a) water quality limits for freshwater, including groundwater; (b) the allocation and use of freshwater resources, including groundwater; and (c) integrated management of the effects of the use and development of land and freshwater on coastal water and the coastal environment.	
(6) Require resource management decisions to have particular regard to potential impacts on all of the following: (a) the holistic nature of the Mana Whenua world view; (b) the exercise of kaitiakitanga; (c) mauri, particularly in relation to freshwater and coastal resources; (d) customary activities, including mahinga kai; (e) sites and areas with significant spiritual or cultural heritage value to Mana Whenua; and (f) any protected customary right in accordance with the Marine and Coastal Area (Takutai Moana) Act 2011.	This policy is considered to be met for the reasons identified above.
B7 Natural Resources B7.2 Indigenous Biodiversity B7.2.1 Objectives	

(1) Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision use and development.	Whilst not areas of areas of significant indigenous biodiversity value have been identified within the site, enhancement planting will be undertaken around the perimeter of wetland and stream areas.
(2) Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.	The proposal will improve and enhance existing degraded freshwater systems on the site through riparian planting and daylighting of streams.
B7.2.2 Policies	
(1) Identify and evaluate areas of indigenous vegetation and the habitats of indigenous fauna in terrestrial and freshwater environments considering the following factors in terms of the descriptors contained in Schedule 3 Significant Ecological Areas – Terrestrial Schedule: (a) representativeness; (b) stepping stones, migration pathways and buffers; (c) threat status and rarity; (d) uniqueness or distinctiveness; and (e) diversity.	N/A – not relevant to proposal as this policy directs the Council to incorporate areas of indigenous vegetation and the habitats of indigenous fauna and include them within Schedule 3.
(2) Include an area of indigenous vegetation or a habitat of indigenous fauna in terrestrial or freshwater environments in the Schedule 3 of Significant Ecological Areas – Terrestrial Schedule if the area or habitat is significant.	
(3) Include an area of indigenous vegetation or a habitat of indigenous fauna in terrestrial or freshwater environments in the Schedule 3 of Significant	

Ecological Areas – Terrestrial Schedule if the area or habitat is significant. (a) recognised international or national significance; (b) threat status and rarity; (c) uniqueness or distinctiveness; (d) diversity; (e) stepping stones, buffers and migration pathways; and (f) representativeness.	
(4) Include an area of indigenous vegetation or a habitat of indigenous fauna in the coastal marine area in the Schedule 4 Significant Ecological Areas – Marine Schedule if the area or habitat is significant.	
(5) Avoid adverse effects on areas listed in the Schedule 3 of Significant Ecological Areas – Terrestrial Schedule and Schedule 4 Significant Ecological Areas – Marine Schedule.	The proposal will enhance existing degraded freshwater systems on the site. The site does not contain any Significant Ecological Areas.
B7.3 Freshwater systems B7.3.1 Objectives	
(1) Degraded freshwater systems are enhanced.	The protection and enhancement of the health and well-being water bodies, streams and freshwater ecosystems has been considered through the design of the development. This is evident through the subdivision pattern and development layout which has been purposely located and designed to avoid streams and natural wetlands as far as practicable. However, it was not feasible to retain Stream A wetland and the two eastern tributaries of Stream A due to the location of Drury Boulevard and this was discussed with mana whenua extensively. The ecological value of Stream A wetland is considered to be low due to its modification while Stream A is considered to be of moderate ecological value, typical of rural streams. The effects of the proposed reclamation are addressed through the creation of new stormwater wetland, daylighting, riparian planting and habitat creation in the lower each of Stream A. Though strictly
(2) Loss of freshwater systems is minimised.	
(3) The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.	

	not meeting the offsetting and compensation principles of the effects management hierarchy, the proposal prioritises the health and well-being of water bodies and freshwater ecosystems.
B7.3.2 Policies	
(1) Integrate the management of subdivision, use and development and freshwater systems by undertaking all of the following: (a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of new growth or intensification; (b) ensuring catchment management plans form part of the structure planning process; (c) controlling the use of land and discharges to minimise the adverse effects of runoff on freshwater systems and progressively reduce existing adverse effects where those systems or water are degraded; and (d) avoiding development where it will significantly increase adverse effects on freshwater systems, unless these adverse effects can be adequately mitigated.	The proposal has been designed with a strong focus on ensuring freshwater is managed in an integrated way, and which considers activities and development on a whole-of-catchment basis. The development adopts a holistic, treatment train approach across the site which begins with stormwater runoff controls at-source (e.g., inert materials), followed by capture and treatment, and then the enhancement of receiving environments to enhance their stormwater management function. This is considered to demonstrate that the freshwater is managed in an integrated and whole-of-catchment manner.
(2) Identify degraded freshwater systems.	Degraded freshwater systems have been identified in the Ecological Impact Assessment at Appendix 15.
(3) Promote the enhancement of freshwater systems identified as being degraded to progressively reduce adverse effects.	The proposal involves the enhancement of streams. Refer to the Ecological Impact Assessment at Appendix 15.
(4) Avoid the permanent loss and significant modification or diversion of lakes, rivers, streams (excluding ephemeral streams), and wetlands and their margins, unless all of the following apply:	The reclamation of Stream A wetland and a portion of Stream A is necessary in order to enable efficient land use and optimisation of the roading layout through the proposed location of Drury Boulevard, as well as ensuring excellent stormwater outcomes. As discussed, the project team undertook a consideration of alternatives exercise in consultation with mana whenua whereby seven potential options (including the proposed) were explored to

(a) it is necessary to provide for: (i) the health and safety of communities; or (ii) the enhancement and restoration of freshwater systems and values; or (iii) the sustainable use of land and resources to provide for growth and development; or (iv) infrastructure; (b) no practicable alternative exists; (c) mitigation measures are implemented to address the adverse effects arising from the loss in freshwater system functions and values; and (d) where adverse effects cannot be adequately mitigated, environmental benefits including on-site or off-site works are provided.	achieve the key structuring elements of Drury Centre and namely Drury Boulevard while avoiding and minimising adverse effects on Stream A and the wetland. The final and proposed location and alignment of Drury Boulevard is such that it would require reclamation of the Stream A wetland and the two eastern tributaries of Stream A resulting in the total loss of 176m stream length (211m² stream bed area) and 112m piped stream (56m²) and 2,172 m2 of a natural inland wetland. The effects management hierarchy has been applied as far as practicable to address the effects of the proposed reclamation. Though strictly not meeting the offsetting and compensation principles of the effects management hierarchy, the effects of the proposed reclamation are addressed through the creation of new stormwater wetland, daylighting, riparian planting and habitat creation in the lower each of Stream A. The proposed stormwater wetland (Wetland 2-1) at the head of Stream A will provide some ecological function by ensuring baseflows are maintained within Stream A and at the same time treat stormwater runoff from a portion of the project area thereby improving water quality of the sensitive receiving environment. The daylighting and realignment of Stream A will naturalise the stream and return portions to its natural alignment as well as provide fish passage. Further, the 10m riparian margin provided will contribute to ecological values and functions of Stream A following the works proposed. Further, enhancement planting is also proposed along the Hingaia Stream.
(5) Manage subdivision, use, development, including discharges and activities in the beds of lakes, rivers, streams, and in wetlands, to do all of the following: (a) protect identified Natural Lake Management Areas, Natural Stream Management Areas, and Wetland Management Areas; (b) minimise erosion and modification of beds and banks of lakes, rivers, streams and wetlands; (c) limit the establishment of structures within the beds of lakes, rivers and streams and in wetlands to those that have a functional need or operational requirement to be located there; and (d) maintain or where appropriate enhance:	This policy is considered to be met as: • No part of the site is within the management areas identified in (a); • A range of measures are proposed to minimise erosion and modification of beds and banks of watercourses; • Structures, other than culverts, are not proposed within the beds of watercourses; • Freshwater systems that are retained as part of this proposal will be enhanced as part of the proposal; and • There is a lack of existing riparian vegetation on the site. Notwithstanding, significant riparian planting and enhancement is proposed.

(i) freshwater systems not protected under Policy B7.3.2(5)(a); (ii) navigation along rivers and public access to and along lakes, rivers and streams; (iii) existing riparian vegetation located on the margins of lakes, rivers, streams and wetlands; and (iv) areas of significant indigenous biodiversity.	
(6) Restore and enhance freshwater systems where practicable when development, change of land use, and subdivision occur.	The proposal is considered to achieve this policy as it involves subdivision and change of land use which will be undertaken in a manner which restores and enhances freshwater systems through the proposed stormwater management approach and principles and enhancement planting proposed.
B7.4. Coastal water, freshwater and geothermal water B7.4.1. Objectives	
(1) Coastal water, freshwater and geothermal water are used within identified limits while safeguarding the life-supporting capacity and the natural, social and cultural values of the waters.	N/A - use of these waters not proposed
(2) The quality of freshwater and coastal water is maintained where it is excellent or good and progressively improved over time where it is degraded.	The proposal will result in the improvement of the quality of freshwater over time. In particular, the stormwater management strategy, including a water sensitive design approach, for the development will ensure that the effects of point discharges on freshwater are minimised.
(3) Freshwater and geothermal water is allocated efficiently to provide for social, economic and cultural purposes.	
(4) The adverse effects of point and non-point discharges, in particular stormwater runoff and wastewater discharges, on coastal waters, freshwater and	

geothermal water are minimised and existing adverse effects are progressively reduced.	
(5) The adverse effects from changes in or intensification of land use on coastal water and freshwater quality are avoided, remedied or mitigated.	
(6) Mana Whenua values, mātauranga and tikanga associated with coastal water, freshwater and geothermal water are recognised and provided for, including their traditional and cultural uses and values.	This objective is considered to be achieved for the reasons set out under the objectives and policies for B6 Mana Whenua above.
B7.4.2 Policies	
(1) Integrate the management of subdivision, use, development and coastal water and freshwater, by: (a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of growth; and (b) requiring catchment management planning as part of structure planning; (c) controlling the use of land and discharges to minimise the adverse effects of runoff on water and progressively reduce existing adverse effects where those water are degraded; and (d) avoiding development where it will significantly increase adverse effects on water, unless these adverse effects can be adequately mitigated.	The development takes an integrated approach to the management of subdivision, use, development and coastal and freshwater. • Adequate water supply, stormwater and wastewater is provided as outlined in Section 10.9 of the AEE. • Catchment management has been considered as part of the servicing strategy as noted in the Stormwater Assessment. • Minimising any adverse effects of runoff on water has been provided for in the stormwater design, with Woods considering that the proposed discharges will meet water quality requirements. It is considered that the proposal can protect and enhance the receiving environment.
(2) Give effect to the National Policy Statement for Freshwater Management 2014 by establishing all of the following: (a) freshwater objectives;	The NPS-FM came into effect on 3 September 2020 and focusses on the fundamental concept of Te Mana o te Wai referring to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. In our view, the proposal as whole is generally consistent with the NPS-FM for reasons as given above and in the AEE. However, the offsetting and compensation principles are not strictly

(b) freshwater management units and, for each unit: (i) values; (ii) water quality limits; (iii) environmental flows and/or levels; and (c) targets and implementation methods where freshwater units do not meet freshwater objectives.	adhered to thereby resulting in a net loss of ecological values and extent associated with the reclamation of Stream A wetland and the two eastern tributaries of Stream A
(3) Integrate Mana Whenua values, mātauranga and tikanga when giving effect to the National Policy Statement for Freshwater Management 2014 in establishing all of the following: (a) water quality limits for freshwater, including groundwater; (b) the allocation and use of freshwater resources, including groundwater; and (c) measures to improve the integrated management of the effects of the use and development of land and freshwater on coastal water and the coastal environment.	This objective is considered to be achieved for the reasons set out under the objectives and policies for B6 Mana Whenua above.
(4) Identify areas of coastal water and freshwater bodies that have been degraded by human activities.	Existing freshwater waterways have been identified within the Ecological Impact Assessment as Appendix 15.
(5) Engage with Mana Whenua to: (a) identify areas of degraded coastal water where they have a particular interest; and (b) remedy or, where remediation is not practicable, mitigate adverse effects on these degraded areas and values.	The applicant has consulted with Mana Whenua on the proposal. The proposal has provided the opportunity for Mana Whenua to actively participate in the sustainable management of natural and physical resources in relation to the natural resource of freshwater, and enhancing this overall with the proposed riparian planting with native species.

(6) Progressively improve water quality in areas identified as having degraded water quality through managing subdivision, use, development and discharges.	This is considered to be met for the reasons set out under B7.3.2(6) above.
(7) Manage the discharges of contaminants into water from subdivision, use and development to avoid where practicable, and otherwise minimise, all of the following: (a) significant bacterial contamination of freshwater and coastal water; (b) adverse effects on the quality of freshwater and coastal water; (c) adverse effects from contaminants, including nutrients generated on or applied to land, and the potential for these to enter freshwater and coastal water from both point and non-point sources; (d) adverse effects on Mana Whenua values associated with coastal water, freshwater and geothermal water, including wāhi tapu, wāhi taonga and mahinga kai; and (e) adverse effects on the water quality of catchments and aquifers that provide water for domestic and municipal supply.	This is considered to be met for the reasons set out under B7.4.1(4) and B7.3.2(5) above.
(8) Minimise the loss of sediment from subdivision, use and development, and manage the discharge of sediment into freshwater and coastal water, by: (a) promoting the use of soil conservation and management measures to retain soil and sediment on land; and	It is considered that the implementation of robust erosion and sediment control measures during earthworks (specific methodologies for works in proximity to streams and measures to minimise changes to contributing catchments), detailed through an approved Erosion and Sediment Control Plan will minimise the loss of sediment from subdivision, use and development into freshwater. The erosion and sediment controls will adhere to industry best practice.

(b) requiring land disturbing activities to use industry best practice and standards appropriate to the nature and scale of the land disturbing activity and the sensitivity of the receiving environment.	
(9) Manage stormwater by all of the following: (a) requiring subdivision, use and development to: (i) minimise the generation and discharge of contaminants; and (ii) minimise adverse effects on freshwater and coastal water and the capacity of the stormwater network; (b) adopting the best practicable option for every stormwater diversion and discharge; and (c) controlling the diversion and discharge of stormwater outside of areas serviced by a public stormwater network.	The development will be undertaken in a way which minimises the generation and discharge of contaminants through staged development, and works being undertaken in accordance with various management plans and conditions of consent. The proposed stormwater management as outlined in the Drury Centre and Drury East SMP is considered the best practicable option.
(10) Manage the adverse effects of wastewater discharges to freshwater and coastal water by all of the following: (a) ensuring that new development is supported by wastewater infrastructure with sufficient capacity to serve the development; (b) progressively reducing existing network overflows and associated adverse effects by all of the following: (i) making receiving environments that are sensitive to the adverse effects of wastewater discharges a priority;	As part of the Drury Centre Stage 1 Fast Track Consent (BUN60390224), subdivision of the residential superlots was accounted for in the design. In terms of the infrastructure servicing of these superlots, this was accounted for in the EPA design (ENG6042965). The EPA approved water and wastewater lot connections for each superlot has been designed to accommodate the required capacity for further subdivision of the superlots. Therefore, the approved infrastructure has capacity to service the subdivided superlots. The Stage 2 development will be serviced by connecting to the gravity wastewater network established in Stage 1 (LUC60390225, ENG60429650), ultimately draining to the existing WSL wastewater pump station located adjacent to Flanagan Road. In summary, the proposed infrastructure provides the necessary capacity to accommodate the development.

(ii) adopting the best practicable option for preventing or minimising the adverse effects of discharges from wastewater networks including works to reduce overflow frequencies and volumes; (iii) ensuring plans are in place for the effective operation and maintenance of the wastewater network and to minimise dry weather overflow discharges; (iv) ensuring processes are in place to mitigate the adverse effects of overflows on public health and safety and the environment where the overflows occur; (c) adopting the best practicable option for minimising the adverse effects of discharges from wastewater treatment plants; and (d) ensuring on-site wastewater systems avoid significant adverse effects on freshwater and coastal water.	
(11) Promote the efficient allocation of freshwater and geothermal water by all of the following: (a) establishing clear limits for water allocation; (b) avoiding over-allocation of water, including phasing out any existing overallocation; (c) safeguarding spring flows, surface waterbody base flows, ecosystem processes, life-supporting capacity, the recharge of adjacent aquifers, and geothermal temperature and amenity; and	N/A – not relevant to proposal

(d) providing for the reasonable requirements of domestic and municipal water supplies.	
(12) Promote the efficient use of freshwater and geothermal water.	N/A – not relevant to proposal
(13) Promote the taking of groundwater rather than the taking of water from rivers and streams in areas where groundwater is available for allocation.	N/A – not relevant to proposal
(14) Enable the harvesting and storage of freshwater and rainwater to meet increasing demand for water and to manage water scarcity conditions, including those made worse by climate change.	N/A – not relevant to proposal
B10. Environmental risk B10.2.1 Objectives	
(1) Communities are more resilient to natural hazards and the effects of climate change.	The development has been designed to avoid the natural hazards applying to the site.
(2) The risks to people, property, infrastructure and the environment from natural hazards are not increased in existing developed areas.	
(3) New subdivision, use and development avoid the creation of new risks to people, property and infrastructure.	
(4) The effects of climate change on natural hazards, including effects on sea level rise and on the frequency and severity of storm events, is recognised and provided for.	The effects of climate change on natural hazards have been recognised and provided for in the development.

(5) The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development.	The function of existing floodplains will be maintained. No development is proposed in these locations.
(6) The conveyance function of overland flow paths is maintained.	The development has been designed to maintain the conveyance function of existing floodplains and overland flows on the site. Overland flows have been incorporated into the civil engineering design and contained within the road reserves.
B10.2.2 Policies	
(1) Identify areas potentially affected by natural hazards, giving priority to those at high risk of being affected, particularly in the coastal environment.	Areas potentially affected by natural hazards have been identified and avoided or mitigated as necessary.
(2) Undertake natural hazard identification and risk assessments as part of structure planning.	Natural hazards relating to flooding have been identified and accounted for in the design.
(3) Ensure the potential effects of climate change are taken into account when undertaking natural hazard risk assessments.	The effects of climate change on natural hazards have been considered as part the flood modelling outlined within Section 12 of the Stormwater Assessment attached as **Appendix 11**.
(4) Assess natural hazard risks: (a) using the best available and up-to-date hazard information; and (b) across a range of probabilities of occurrence appropriate to the hazard, including, at least, a 100-year timeframe for evaluating flooding and coastal hazards.	The proposal is being undertaken in accordance with the Drury Centre and Drury East SMP. An updated model and flood hazard assessment has been carried out by Woods in the Stormwater Assessment. The results helped to inform and develop specific flood management strategies for the proposal.
(5) Manage subdivision, use and development of land subject to natural hazards based on all of the following: (a) the type and severity of potential events, including the occurrence natural hazard events in combination;	Development will be located outside of flood hazard areas. The flood model results indicate that the post development flood levels generally decrease when compared to the pre-development scenario. Minor increases in water levels are noted in the northern (A) and western (B) portions of the site and are not considered to pose any threat to the proposed development, as they do not encroach any proposed building footprints and are contained within the stream. The portion of the site subject to flooding is proposed to be retained as watercourses and open space.

(b) the vulnerability of the activity to adverse effects, including the health and safety of people and communities, the resilience of property to damage and the effects on the environment; and (c) the cumulative effects of locating activities on land subject to natural hazards and the effects on other activities and resources.	As noted in the Infrastructure Report as Appendix 10, specific slope stability analysis has been undertaken by CMW. In reference to this analysis, the results demonstrate that appropriate factors of safety can be achieved for the proposed profile with further assessment to be undertaken in subsequent detailed engineering and earthworks design which is consistent standard development and consenting practices.
(6) Adopt a precautionary approach to natural hazard risk assessment and management in circumstances where: (a) the effects of natural hazards and the extent to which climate change will exacerbate such effects are uncertain but may be significant, including the possibility of low-probability but high potential impact events; or (b) the level of information on the probability and/or impacts of the hazard is limited.	The effects of climate change on natural hazards have been considered as part the Stormwater Assessment as Appendix 11.
(7) Avoid or mitigate the effects of activities in areas subject to natural hazards, such as earthworks, changes to natural and built drainage systems, vegetation clearance and new or modified structures, so that the risks of natural hazards are not increased.	Refer to comments in relation to B10.2.1(3) and B10.2.1(4).
(8) Manage the location and scale of activities that are vulnerable to the adverse effects of natural hazards so that the risks of natural hazards to people and property are not increased.	
(9) Encourage activities that reduce, or do not increase, the risks posed by natural hazards, including any of the following:	

(a) protecting and restoring natural landforms and vegetation; (b) managing retreat by relocation, removal or abandonment of structures; (c) replacing or modifying existing development to reduce risk without using hard protection structures; (d) designing for relocatable or recoverable structures; or (e) providing for low-intensity activities that are less vulnerable to the effects of relevant hazards, including modifying their design and management.	
(10) Encourage redevelopment on land subject to natural hazards to reduce existing risks and ensure no new risks are created by using a range of measures such as any of the following: (a) the design and placement of buildings and structures; (b) managing activities to increase their resilience to hazard events; or (c) change of use to a less vulnerable activity.	
(11) Strengthen natural systems such as flood plains, vegetation and riparian margins, beaches and sand dunes in preference to using hard protection structures.	The proposal will protect and enhance riparian margins through riparian planting.
(12) Minimise the risks from natural hazards to new infrastructure which functions as a lifeline utility by:	Infrastructure has been located outside of flood hazard areas. The Geotechnical Investigation Report as **Appendix 12** notes that in an SLS or ULS seismic event liquefaction induced settlements and ground damage is unlikely to affect the site.

(a) assessing the risks from a range of natural hazard events including low probability but high potential impact events such as tsunami, earthquake and volcanic eruptions; (b) utilising design, location and network diversification to minimise the adverse effects on infrastructure and to minimise the adverse effects on the community from the failure of that infrastructure.	
(13) Require areas potentially affected by coastal hazards over the next 100 years to do all of the following: (a) avoid changes in land use that would increase the risk of adverse effects from coastal hazards; (b) do not increase the intensity of activities that are vulnerable to the effects of coastal hazards beyond that enabled by the Plan; (c) in the event of redevelopment, minimise natural hazard risks through the location and design of development; and (d) where it is impracticable to locate infrastructure outside of coastal hazard areas, then ensure coastal hazard risks are mitigated.	N/A – the site is not subject to coastal hazards
B10.3.1 Objectives	
(1) The environment is protected from adverse effects associated with the storage, use, disposal and transport of hazardous substances.	N/A transportation of hazardous substances not proposed.
(2) The storage, use, disposal and transport of hazardous substances are provided for and the social and economic benefits of these activities are recognised.	N/A transportation of hazardous substances not proposed.

B10.3.2 Policies	
(1) Manage the use and development of land for hazardous facilities and industrial or trade activities to avoid adverse effects on human health and the environment and remedy or mitigate these effects where they cannot be avoided.	N/A – no hazardous facilities or ITA proposed.
(2) Manage the use and development of land for hazardous facilities: (a) so that such facilities are resilient to the effects of natural hazards; (b) to avoid, remedy or mitigate adverse effects on people and property; (c) to avoid as far as practicable the contamination of air, land, and water; and (d) to minimise risks caused by natural hazards.	N/A – no hazardous facilities proposed.
(3) Manage the effects associated with use and development of land for hazardous facilities by all of the following: (a) restricting the establishment of sensitive activities near hazardous facilities or areas identified for hazardous facilities if the activities are likely to be adversely affected by a hazardous facility or if they have the potential to limit the operation of the hazardous facility; (b) ensuring new hazardous facilities are not located near sensitive activities unless significant adverse effects, including cumulative effects, are avoided and other adverse effects are mitigated; and	

(c) providing areas for hazardous facilities away from sensitive activities so that the facilities may carry out their operations without unreasonable constraints.	
B10.4.1 Objective	
(1) Human health and the quality of air, land and water resources are protected by the identification, management and remediation of land that is contaminated	Testing has been undertaken in the Detailed Site Investigation provided as **Appendix 13C**. Areas of contamination will be remediated to ensure the site is safe for the intended development and use. The Remedial Action Plan provided as **Appendix 13A** has outlined controls for contamination remediation of asbestos and heavy metals to mitigate risks to environmental receptors and protect human health.
B10.4.2 Policies	
(1) Identify land that is or may be contaminated based on: (a) sites known to have supported contaminating land use activities in the past; (b) sites with a significant potential risk to human health; or (c) sites having significant adverse effects on the environment.	
(2) Land which may be contaminated due to having supported contaminating land use activities in the past but has not been investigated will be identified as being potentially contaminated.	
(3) Manage or remediate land that is contaminated where: (a) the level of contamination renders the land unsuitable for its existing or proposed use; or (b) the discharge of contaminants from the land is generating or is likely to generate significant adverse effects on the environment; or	

(c) development or subdivision of land is proposed.	

5.0 Auckland Unitary Plan (Operative in Part) – Chapter E

Objective/Policy	Assessment
Chapter D Overlays D26 National Grid Corridor Overlay D26.2 Objective	
(1) The efficient development, operation, maintenance and upgrading of the National Grid is not compromised by subdivision, use and development.	Refer to comments in relation to B3.2.1(7).
D26.3 Policies	
(1) Require subdivision, use and development within the National Grid Corridor Overlay to be undertaken so that it: (a) meets the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001); (b) does not compromise security of supply and/or the integrity of National Grid assets; (c) does not compromise ongoing access to conductors and support structures for maintenance and upgrading works; (d) does not foreclose future cable routes into substations in roads in urban areas; (e) does not foreclose operation and maintenance options or the carrying out of planned upgrade works; (f) manages all activities to avoid exposure to health and safety risk from the National Grid;	Refer to comments in relation to B3.2.1(7).

(g) manages activities sensitive to the National Grid to minimise exposure to nuisance, such as noise and line drip from the National Grid; (h) avoids the establishment or expansion of activities sensitive to transmission lines in the National Grid Yard and around substations; (i) provides for use and development, except for activities sensitive to the National Grid, in the National Grid Yard (Compromised); (j) avoids new structures and buildings within the National Grid Yard (Uncompromised), except for buildings for low intensity rural activities and minor structures; and (k) limits, as far as practicable, potential reverse sensitivity effects.	
(2) Require structure plans to take into account the National Grid Corridor overlay to ensure that the National Grid is not compromised by reverse sensitivity and other effects from future subdivision, use and development.	N/A – not relevant to proposal
(3) Require activities within the National Grid Corridor overlay within the coastal marine area to be undertaken so that they achieve all relevant items in Policy D26.3(1).	N/A – not relevant to proposal
E1 Water quality and integrated management E1.2 Objectives	
(1) Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.	The quality of freshwater in this environment is considered to range from low to high. Freshwater quality will be improved by the proposal as noted in the Ecological Impact Assessment.
(2) The mauri of freshwater is maintained or progressively improved over time to enable traditional and cultural use of this resource by Mana Whenua.	Given the stormwater treatment proposed, water quality will be maintained when it discharges into Hingaia Stream.

(3) Stormwater and wastewater networks are managed to protect public health and safety and to prevent or minimise adverse effects of contaminants on freshwater and coastal water quality.	As noted in the Stormwater Assessment and Infrastructure Report, the proposal involves infrastructure which is appropriate to the scale of the development to ensure no capacity effects or effects on public health and safety will occur.
E1.3 Policies	
(1) Manage discharges, until such time as objectives and limits are established in accordance with Policy E1.3(7), having regard to: (a) the National Policy Statement for Freshwater Management National Bottom Lines; (b) the Macroinvertebrate Community Index as a guideline for freshwater ecosystem health associated with different land uses within catchments in accordance with Policy E1.3(2); or (c) other indicators of water quality and ecosystem health.	The proposal intends to maintain water quality, flows, stream channels and associated freshwater values through substantial riparian planting and enhancement works. The proposed stormwater discharges have been designed in accordance with BPO. An assessment of effects is provided within the Ecological Impact Assessment and it is noted that the proposed discharges will have an effect on the level range or hydrological function of the wetlands that is considered to be very low to low, and to some extent positive.
(2) Manage discharges, subdivision, use, and development that affect freshwater systems to: (a) maintain or enhance water quality, flows, stream channels and their margins and other freshwater values, where the current condition is above National Policy Statement for Freshwater Management National Bottom Lines and the relevant Macroinvertebrate Community Index guideline in Table E1.3.1 below; or (b) enhance water quality, flows, stream channels and their margins and other freshwater values where the current condition is below national bottom lines or the relevant Macroinvertebrate Community Index guideline in TableE1.3.1 below. Table E1.3.1 Macroinvertebrate Community Index guideline for Auckland rivers and streams	

Land use	Macroinvertebrate Community Index guideline
Native forest	123
Exotic forest	111
Rural areas	94
Urban areas	68

Note 1

When assessing the existing Macroinvertebrate Community Index in a stream against the Macroinvertebrate Community Index guideline in Table E1.3.1 above, standard protocols for semi-quantitative sample collection should be used as described in Protocols for sampling macroinvertebrates in wadeable streams, New Zealand Macroinvertebrate Working Group Report No. 1, Stark, J.D. et al., Prepared for the Ministry for the Environment 2001.

Note 2
Where an activity crosses more than one land use or a river or stream traverses the border between two land use types at the location of the activity or the point of discharge, the lower Macroinvertebrate Community Index value shall be used.

Note 3
Refer to the planning maps for the Macroinvertebrate Community Index Control to identify the land use types for the area

(3) Require freshwater systems to be enhanced unless existing intensive land use and development has irreversibly modified them such that it practicably precludes enhancement.	As discussed under Policies E1.3(1) and (2) above.

(4) When considering any application for a discharge, the Council must have regard to the following matters: (a) the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of freshwater including on any ecosystem associated with freshwater; and (b) the extent to which it is feasible and dependable that any more than a minor adverse effect on freshwater, and on any ecosystem associated with freshwater, resulting from the discharge would be avoided.	With regards to stormwater, a water sensitive design philosophy is proposed for the project. At a minimum, SMAF 1 hydrological mitigation will be provided for all impervious surfaces within the development. This includes the design of stormwater treatment devices consistent with Auckland Council's GD01. It is proposed that bioretention devices are integrated into the stormwater network to treat stormwater runoff for the water quality flow from impervious trafficable areas. With the level of stormwater treatment proposed, it is not considered likely that the discharge will have a more than minor adverse effect on freshwater.
(5) When considering any application for a discharge the Council must have regard to the following matters: (a) the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their secondary contact with fresh water; and (b) the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their secondary contact with fresh water resulting from the discharge would be avoided.	
(6) Policies E1.3(4) and (5) apply to the following discharges (including a diffuse discharge by any person or animal): (a) new discharge; or (b) a change or increase in any discharge of any contaminant into freshwater, or onto or into land in circumstances that may result in that contaminant (or, as a result of any natural process from the discharge of that contaminant, any other contaminant) entering freshwater. Note 1	

Policies E1.3(4) – (6) are policy A4 of the National Policy Statement for Freshwater Management which are required by the National Policy Statement for Freshwater Management to be incorporated in regional plan provisions under section 55 of the Resource Management Act 1991 without using the process in schedule 1. They apply until full effect has been given to the National Policy Statement for Freshwater Management. Policy E1.3(4) does not apply to any application for consent first lodged before the National Policy Statement for Freshwater Management 2011 took effect on 1 July 2011. Policy E1.3(5) does not apply to any application for consent first lodged before the National Policy Statement for Freshwater Management 2014 takes effect.	
(7) Develop Freshwater Management Unit specific objectives and limits for freshwater with Mana Whenua, through community engagement, scientific research and mātauranga Māori, to replace the Macroinvertebrate Community Index interim guideline and to give full effect to the National Policy Statement for Freshwater Management. Note 1 Policy E1.3(7) above does not preclude the use of the Macroinvertebrate Community Index as a Freshwater Management Unit-specific objective/limit in future.	N/A – not relevant to proposal
(8) Avoid as far as practicable, or otherwise minimise or mitigate, adverse effects of stormwater runoff from greenfield development on freshwater systems, freshwater and coastal water by: (a) taking an integrated stormwater management approach (refer to Policy E1.3.10); (b) minimising the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads and into sensitive receiving environments; (c) minimising or mitigating changes in hydrology, including loss of infiltration, to:	The proposal is considered to meet this policy as: An integrated stormwater management approach has been taken (refer to Stormwater Assessment and SMP for Drury Centre); • The generation and discharge of contaminants from car parks and roads into sensitive receiving environments will be minimised through bioretention and stormwater devices; • The provision of detention is anticipated to result in the outcomes listed in E1.2.1(8)(i) to (iii); • The proposed bioretention devices will remove stormwater gross pollutants, such as litter; and

(i) minimise erosion and associated effects on stream health and values; (ii) maintain stream baseflows; and (iii) support groundwater recharge; (d) (d) where practicable, minimising or mitigating the effects on freshwater systems arising from changes in water temperature caused by stormwater discharges; and (e) providing for the management of gross stormwater pollutants, such as litter, in areas where the generation of these may be an issue.	The proposed development and residential intensification will be serviced by appropriate stormwater infrastructure (refer to Stormwater Assessment as Appendix 11).
(9) Minimise or mitigate new adverse effects of stormwater runoff, and where practicable progressively reduce existing adverse effects of stormwater runoff, on freshwater systems, freshwater and coastal waters during intensification and redevelopment of existing urban areas by all of the following: (a) requiring measures to reduce contaminants, particularly from high contaminant-generating car parks and high-use roads; (b) requiring measures to reduce the discharge of gross stormwater pollutants; (c) requiring measures to be adopted to reduce the peak flow rate and the volume of stormwater flows: (i) within sites identified in the Stormwater Management Area – Flow 1 and Flow 2 Control (as shown on the planning maps); (ii) where development exceeds the maximum impervious area for the relevant zone; or (iii) from areas of impervious surface where discharges may give rise to flooding or adversely affect rivers and streams; (d) taking an integrated stormwater management approach for large-scale and comprehensive redevelopment and intensification (refer to Policy E1.3.10 below) and encourage the restoration of freshwater systems where practicable; and	

(e) ensuring intensification is supported by appropriate stormwater infrastructure, including natural assets that are utilised for stormwater conveyance and overland flow paths.	
(10) In taking an integrated stormwater management approach have regard to all of the following: (a) the nature and scale of the development and practical and cost considerations, recognising: (i) greenfield and comprehensive brownfield development generally offer greater opportunity than intensification and small-scale redevelopment of existing areas; (ii) intensive land uses such as high-intensity residential, business, industrial and roads generally have greater constraints; and (iii) site operational and use requirements may preclude the use of an integrated stormwater management approach. (b) the location, design, capacity, intensity and integration of sites/development and infrastructure, including roads and reserves, to protect significant site features and hydrology and minimise adverse effects on receiving environments; (c) the nature and sensitivity of receiving environments to the adverse effects of development, including fragmentation and loss of connectivity of rivers and streams, hydrological effects and contaminant discharges and how these can be minimised and mitigated, including opportunities to enhance degraded environments; (d) reducing stormwater flows and contaminants at source prior to the consideration of mitigation measures and the optimisation of on-site and larger communal devices where these are required; and	These matters have been considered in the stormwater management approach for the site. Refer to the Stormwater Assessment as Appendix 11.

(e) the use and enhancement of natural hydrological features and green infrastructure for stormwater management where practicable	
(11) Avoid as far as practicable, or otherwise minimise or mitigate adverse effects of stormwater diversions and discharges, having particular regard to: (a) the nature, quality, volume and peak flow of the stormwater runoff; (b) the sensitivity of freshwater systems and coastal waters, including the Hauraki Gulf Marine Park; (c) the potential for the diversion and discharge to create or exacerbate flood risks; (d) options to manage stormwater on-site or the use of communal stormwater management measures; (e) practical limitations in respect of the measures that can be applied; and (f) the current state of receiving environments.	
(12) Manage contaminants in stormwater runoff from high contaminant generating car parks and high use roads to minimise new adverse effects and progressively reduce existing adverse effects on water and sediment quality in freshwater systems, freshwater and coastal waters.	Refer to comments under E1.3(1)(8).
(13) Require stormwater quality or flow management to be achieved on-site unless there is a downstream communal device or facility designed to cater for the site's stormwater runoff.	It is proposed that the development will be designed in accordance with the Stormwater Management Area Flow 1 (SMAF 1) control principles of the AUP as per GD01 to provide hydrological mitigation for all impervious surfaces. Hydrological and water quality mitigation will be undertaken in accordance with the BPO identified within the Stormwater Assessment.
(14) Adopt the best practicable option to minimise the adverse effects of stormwater discharges from stormwater network and infrastructure including road, and rail having regard to all of the following:	The best practicable option has been taken into account and adopted to minimise the adverse effects of stormwater discharges from the stormwater network. Refer to the Stormwater Assessment as Appendix 11.

(a) the best practicable option criteria as set out in section 2 of the Resource Management Act 1991; (b) the reasonable timeframes over which adverse effects can be avoided as far as practicable, or otherwise minimised or mitigated; (c) the scale and significance of the adverse effects; (d) infrastructure investment priorities and the consequences of delaying infrastructural improvements in other areas; (e) the ability to prevent or minimise existing adverse effects having regard to the effectiveness and timeframes of other feasible methods, including land use controls; (f) opportunities to integrate with other major infrastructure projects or works; (g) the need to maintain and optimise existing stormwater networks and provide for planned land use and development; and (h) operational requirements and space limitations	
E3. Lakes, rivers, streams and wetlands E3.2.1 Objectives	
(1) Auckland's lakes, rivers, streams and wetlands with high natural values are protected from degradation and permanent loss.	In the context of this application, the network of watercourses to be reclaimed from this proposal is not considered to possess high natural value because the site is not located any of the identified management overlays which signal this. This is further evidenced by the low SEV score of their current state and the MCI which is below the guideline for rural areas.
(2) Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.	The proposal will result in the overall enhancement of watercourses and wetlands.
(3) Significant residual adverse effects on lakes, rivers, streams or wetlands that cannot be avoided, remedied or mitigated are offset where this will promote the purpose of the Resource Management Act 1991.	The reclamation of Stream A wetland and a portion of Stream A is necessary in order to enable efficient land use and optimisation of the roading layout through the proposed location of Drury Boulevard, as well as ensuring excellent stormwater outcomes.

	As discussed, the project team undertook a consideration of alternatives exercise in consultation with mana whenua whereby seven potential options (including the proposed) were explored to achieve the key structuring elements of Drury Centre and namely Drury Boulevard while avoiding and minimising adverse effects on Stream A and the wetland (refer to Consultation Summary Report in Appendix 22 to view alternatives considered). The final and proposed location and alignment of Drury Boulevard is such that it would require reclamation of the Stream A wetland and the two eastern tributaries of Stream A resulting in the total loss of 176m stream length (211m² stream bed area) and 112m piped stream (56m²) and 2,172 m2 of a natural inland wetland. The effects management hierarchy has been applied as far as practicable to address the effects of the proposed reclamation. Though strictly not meeting the offsetting and compensation principles of the effects management hierarchy, the effects of the proposed reclamation are addressed through the creation of new stormwater wetland, daylighting, riparian planting and habitat creation in the lower each of Stream A. The proposed stormwater wetland (Wetland 2-1) at the head of Stream A will provide some ecological function by ensuring baseflows are maintained within Stream A and at the same time treat stormwater runoff from a portion of the project area thereby improving water quality of the sensitive receiving environment. The daylighting and realignment of Stream A will naturalise the stream and return portions to its natural alignment as well as provide fish passage. Further, the 10m riparian margin provided will contribute to ecological values and functions of Stream A following the works proposed. Further, enhancement planting is also proposed along the Hingaia Stream.
(4) Structures in, on, under or over the bed of a lake, river, stream or wetland are provided for where there are functional or operational needs for the structure to be in that location, or traverse that area.	An arch culvert is proposed within stream A where there is a functional need for access (Road 5 crossing). As a general approach, structures within rivers/wetlands have been avoided where possible.
(5) Activities in, on, under or over the bed of a lake, river, stream and wetland are managed to minimise adverse effects on the lake, river, stream or wetland.	

(6) Reclamation and drainage of the bed of a lake, river, stream and wetland is avoided, unless there is no practicable alternative.	This is addressed in the assessment provided against E3.2.1(3) above.
(7) The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages, or their habitats.	The EIA notes that fish passage may be temporarily impacted during the tie in of the daylighted stream upstream on Stream A and downstream on Fitzgerald Stream (expected to take a maximum of two days per tie in section). Little to no habitat exists upstream of the Stream A section, therefore, tie in works and reclamation of the existing section are not expected to impact upstream migration during this period. Given the limited habitat upstream on Stream A, and the small disruption in passage during tie in periods, the magnitude of effect on fish passage during construction is expected to be low within Stream A. Although greater upstream habitat is present within Fitzgerald Stream, given the short duration of disruption to passage, the EIA expects the effect of this temporary activity to be low. Following construction, the EIA anticipates that the post-construction fish passage within the newly created sections of stream channel will be similar to the current open sections of stream. The proposed arch culvert will enable the same fish passage conditions upstream and downstream as would naturally exist without the structure. As such, no modification in fish passage within Stream A is expected as the result of the arch culvert.
E3.3 Policies	
(1) Avoid significant adverse effects, and avoid where practicable or otherwise remedy or mitigate other adverse effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands within the following overlays: (a) D4 Natural Stream Management Areas Overlay;	No works are proposed within streams or wetlands within an SEA Overlay.

(b) D5 Natural Lake Management Areas Overlay; (c) D6 Urban Lake Management Areas Overlay; (d) D9 Significant Ecological Areas Overlay; and (e) D8 Wetland Management Areas Overlay.	
(2) Manage the effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands outside the overlays identified in Policy E3.3(1) by: (a) avoiding where practicable or otherwise remedying or mitigating any adverse effects on lakes, rivers, streams or wetlands; and (b) where appropriate, restoring and enhancing the lake, river, stream or wetland.	The effects of activities within the streams and wetlands have been managed as discussed within the Ecological Impact Assessment as Appendix 15. Overall, the proposal intends to enhance water quality, flows, stream channels and associated freshwater values through the substantial riparian planting and enhancement works.
(3) Enable the enhancement, maintenance and restoration of lakes, rivers, streams or wetlands.	
(4) Restoration and enhancement actions, which may form part of an offsetting proposal, for a specific activity should: (a) be located as close as possible to the subject site; (b) be 'like-for-like' in terms of the type of freshwater system affected; (c) preferably achieve no net loss or a net gain in the natural values including ecological function of lakes, rivers, streams or wetlands; and (d) consider the use of biodiversity offsetting as outlined in Appendix 8 Biodiversity offsetting. Note 1 When having regard to Policy E3.3(4) above, the following documents or any updated version of them should be referred to:	The offsetting proposed for part of Stream A is located within the subject site, 'like for like' in terms of the type of freshwater system and consider the use of biodiversity offsetting as outlined in Appendix 8 Biodiversity offsetting. Offsetting is not proposed for the reclamation of Stream A Wetland. Though a no net loss is anticipated to occur, the residual adverse effects of the proposed reclamation are addressed through the creation of new stormwater wetland, daylighting, riparian planting and habitat creation in the lower each of Stream A. The proposed stormwater wetland (Wetland 2-1) at the head of Stream A will provide some ecological function by ensuring baseflows are maintained within Stream A and at the same time treat stormwater runoff from a portion of the project area thereby improving water quality of the sensitive receiving environment. The daylighting and realignment of Stream A will naturalise the stream and return portions to its natural alignment as well as provide fish passage. Further, the 10m riparian margin provided will contribute to ecological values and functions of Stream A following the works proposed. Further, enhancement planting is also proposed along the Hingaia Stream.

• Auckland Council Technical Report 2011/009: Stream Ecological Valuation (SEV): a method for assessing the ecological functions of Auckland Streams (October 2011) for guidance on how the location and extent of any offset may be calculated and assessed; and • Guidance on Good Practice Biodiversity Offsetting in New Zealand, New Zealand Government et al, August 2014. E3 Lakes, rivers, streams and wetlands Auckland Unitary Plan Operative in part 4 Neither of these reference documents has precedence. An acceptable offsetting proposal may combine elements from both documents.	
(5) Avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands on: (a) the mauri of the freshwater environment; and (b) Mana Whenua values in relation to the freshwater environment.	While the project will impact Stream A and the Stream A wetland, a series of alternative options were considered by the project team prior to proceeding with the proposed design which takes into account mana whenua priorities identified during regular hui with the Drury East Mana Whenua Group. The lower reach of Stream A will also be daylighted, restored and enhanced as part of the project with riparian planting to a minimum of 10m on both sides of streams, and an Ecological Management Plan is proposed as a condition of consent. These enhancements are considered to improve and enhance the mauri of freshwater and aligned with mana whenua values, notwithstanding that there will be a net loss in ecological values. In addition, water-sensitive design providing stormwater quality treatment of contaminants prior to discharge will also contribute to improving water quality and will again enhance the mauri of freshwater. Overall, on the basis that the relevant iwi authorities consulted have not expressed strong objection to the project and the ecological enhancements proposed are aligned with mana whenua values, it is considered that adverse effects on cultural values will be avoided or mitigated and the overall the effects will be positive.
(6) Manage the adverse effects on Mana Whenua cultural heritage that is identified prior to, or discovered during, subdivision, use and development by: (a) complying with the protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin;	This policy is considered to be achieved for the reasons set out under the objectives and policies for B6 Mana Whenua above.

(b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) undertaking appropriate measures to avoid adverse effects, or where adverse effects cannot be avoided, effects are remedied or mitigated	
(7) Provide for the operation, use, maintenance, repair, erection, reconstruction, placement, alteration or extension, of any structure or part of any structure in, on, under, or over the bed of a lake, river, stream or wetland, and any associated diversion of water, where the structure complies with all of the following: (a) there is no practicable alternative method or location for undertaking the activity outside the bed of the lake, river, stream or wetland; (b) the structure is designed to be the minimum size necessary for its purpose to minimise modification to the bed of a lake, river, stream or wetland; (c) the structure is designed to avoid creating or increasing a hazard; (d) the structure is for any of the following: (i) required as part of an activity designed to restore or enhance the natural values of any lakes, rivers, streams or wetlands and their margins, or any adjacent area of indigenous vegetation or habitat of indigenous fauna; (ii) designed to maintain and/or enhance public access to, over and along any lake, river, stream or wetland and their margins; (iii) necessary to provide access across a lake, river, stream or wetland; (iv) associated with infrastructure; E3 Lakes, rivers, streams and wetlands Auckland Unitary Plan Operative in part 5	Precinct Plans 2 and 3 of the Drury Centre Precinct feature an indicative east-west collector road connecting between the two north-south indicative collector roads. Road 5 forms this east-west indicative collector road and a portion of this is proposed over Stream A. That portion of Road 5 over Stream A will avoid instream works because the design involves an arched culvert that will retain and span the stream bed and its margins. This length of this arched culvert is approximately 20m and will be designed to comply with the relevant permitted activity standards in Chapter E3 of the AUP and permitted activity conditions in regulation 70(2) of the National Environmental Standards for Freshwater Regulations.

(v) necessary for flood protection and the safeguarding of public health and safety; or (vi) required for the reasonable use of production land. (e) the structure avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.	
(8) Enable the removal or demolition of any structure or part of any structure in, on, under, or over the bed of a lake, river, stream or wetland, and any associated diversion of water, provided adverse effects are avoided, remedied or mitigated.	Existing culverts will be removed and where necessary, replaced.
(9) Provide for the excavation, drilling, tunnelling, thrusting or boring or other disturbance, and the depositing of any substance in, on or under the bed of a lake, river, stream or wetland, where it complies with all of the following: (a) there is no practicable alternative method or location for undertaking the activity outside the lake, river, stream or wetland; (b) the activity is required for any of the following: (i) as part of an activity designed to restore or enhance the natural values of any lake, river, stream or wetland, or any adjacent area of indigenous vegetation or habitat of indigenous fauna; (ii) to maintain and/or enhance public access to, over and along any lake, river, stream or wetland and associated margins; (iii) to provide access across a lake, river, stream or wetland; (iv) for the operation, use, maintenance, repair, development or upgrade of infrastructure;	N/A – no works of this kind are proposed.

(v) to restore, maintain or improve access to wharves and jetties or mooring areas, or to maintain the navigation and safety of existing channels; (vi) to reduce the risk of occurrence or the potential adverse effects of flooding, erosion, scour or sediment depositing; (vii) for the reasonable use of production land; or (viii) to undertake mineral extraction activities and mitigation and following that, offsetting can be practicably implemented. (c) the disturbance avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.	
(10) Enable the planting of any plant, excluding pest species, in, on, or under the bed of a lake, river, stream or wetland where it is suitable for habitat establishment, restoration or enhancement, the maintenance and enhancement of amenity values, flood or erosion protection or stormwater runoff control provided it does not create or exacerbate flooding.	As set out in the landscaping package, the planting strategy for the site includes restoration and enhancement planting within wetlands and along the margins of streams.
(11) Encourage the planting of plants that are native to the area.	The proposal sees extensive native planting across the site.
(12) Encourage the incorporation of Mana Whenua mātauranga, values and tikanga in any planting in, on, or under the bed of a lake, river, stream or wetland	
(13) Avoid the reclamation and drainage of the bed of lakes, rivers, streams and wetlands, including any extension to existing reclamations or drained areas unless all of the following apply: (a) there is no practicable alternative method for undertaking the activity outside the lake, river, stream or wetland;	The arch culvert has been located where there is no practicable alternative location. This is discussed in greater detail in Section 10.12 of the AEE.

(b) for lakes, permanent rivers and streams, and wetlands the activity is required for any of the following: (i) as part of an activity designed to restore or enhance the natural values of any lake, river, stream or wetland, any adjacent area of indigenous vegetation or habitats of indigenous fauna; (ii) for the operation, use, maintenance, repair, development or upgrade of infrastructure; or (iii) to undertake mineral extraction activities; and	With respect to the wetland and stream reclamation, this is addressed in the assessment provided against E3.2.1(3) above
(c) the activity avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.	Mana whenua have been consulted with regard to proposed riparian enhancement, and native species will be utilised when undertaking riparian planting.

(14) Avoid more than minor adverse effects on freshwater and coastal water from livestock grazing	No livestock grazing is proposed.
(15) Protect the riparian margins of lakes, rivers, streams, and wetlands from inappropriate use and development and promote their enhancement to through all of the following: (a) safeguard habitats for fish, plant and other aquatic species, particularly in rivers and streams with high ecological values; (b) safeguard their aesthetic, landscape and natural character values; (c) safeguard the contribution of natural freshwater systems to the biodiversity, resilience and integrity of ecosystems; and	The proposed enhancement of existing degraded streams and wetlands via riparian planting provides for the health and well-being of water bodies and freshwater ecosystems.

(d) avoid or mitigate the effects of flooding, surface erosion, stormwater contamination, bank erosion and increased surface water temperature.	
(16) Protect land alongside streams for public access through the use of esplanade reserves and esplanade strips, marginal strips, drainage reserves, easements or covenants where appropriate and for water quality, ecological and landscape protection purposes	Hingaia Stream will be protected via esplanade reserve as part of the proposed subdivision. All other streams within the site have a width of less than 3-metres, there is no requirement to provide esplanade reserves or strips. Notwithstanding this, riparian setbacks and planting will be provided to protect the streams and these areas will be protected by consent notice conditions.
(17) The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where: (a) the loss of extent or values arises from any of the following: (i) the customary harvest of food or resources undertaken in accordance with tikanga Māori (ii) wetland maintenance, restoration, or biosecurity (as defined in the National Policy Statement for Freshwater Management) (iii) scientific research (iv) the sustainable harvest of sphagnum moss (v) the construction or maintenance of wetland utility structures (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020) (vi) the maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (vii) natural hazard works (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020); or	As noted in Ecological Impact Assessment, works within wetlands is mostly avoided and the alternatives have been assessed within Section 10.12 of the AEE. Where loss of natural inland wetlands cannot be avoided, no offset or compensation measures are proposed and this is addressed in the assessment provided against E3.2.1(3) above.
(18) The loss of river extent and values is avoided, unless the council is satisfied: (a) that there is a functional need for the activity in that	This is addressed in the assessment provided against E3.2.1(3) above.

location; and (b) the effects of the activity are managed by applying the effects management hierarchy.	
E6 Wastewater network management	
N/A – the objectives and policies under E6 refer to the provisions in E1 Water quality and integrated management. These are assessed above.	
E8 Stormwater diversion and discharge	
N/A. The objectives and policies under E8 refer to the provisions in E1 Water quality and integrated management and E2 Water quantity, allocation and use. These are assessed above.	
E9 Stormwater quality	
N/A – the objectives and policies under E9 refer to the provisions in E1 Water quality and integrated management. These are assessed above.	
E10 Stormwater management area - Flow 1 and Flow 2 **E10.2 Objectives**	
(1) High value rivers, streams and aquatic biodiversity in identified urbanised catchments are protected from further adverse effects of stormwater runoff associated with urban development and where possible enhanced.	The proposed stormwater management approach for the development includes a range of treatment measures (such as at-source and within road reserves) to ensure that the quality and health of receiving environments is protected.
E10.3 Policies	
(1) Manage stormwater runoff from impervious areas in Stormwater management area – Flow 1 and Flow 2 areas to minimise the adverse effects of stormwater runoff on rivers and streams to retain, and where possible enhance, stream naturalness, biodiversity, bank stability and other values.	Hydrological mitigation is proposed in accordance with GD05 which will protect rivers and streams, and their banks. The design includes carefully considered outfall structures to the existing streams, incorporating energy dissipation and erosion protection measures.
(2) Require stormwater hydrology mitigation in Stormwater management area control – Flow 1 and Flow 2 areas where there are: (a) new impervious areas; (b) redeveloped impervious areas; or	Hydrological mitigation has been provided in accordance with GD01 requirements – refer to the Stormwater Assessment as **Appendix 11**. The Infrastructure Report as **Appendix 10** notes that stormwater management strategy adopts a comprehensive approach that includes flood management, hydrological mitigation, and water quality treatment. All impervious surfaces within the development will meet SMAF 1 hydrological mitigation

(c) entire sites where the area of development or redevelopment comprises more than 50 per cent of the site area.	requirements. The design prioritizes the use of communal treatment devices where practical, incorporating raingardens and bioretention systems for both public roads and private areas.
(3) Recognise that there may be limitations to the hydrology mitigation that can practicably be achieved in some circumstances, particularly in association with redevelopment, including: (a) space limitations; (b) requirements to provide for other utility services; and (c) the function of roads as overland flow paths conveying stormwater runoff from surrounding land uses which the road controlling authority has limited ability to control.	
E11 Land Disturbance – Regional **E11.2 Objectives**	
Objectives 1-3 (1) Land disturbance is undertaken in a manner that protects the safety of people and avoids, remedies or mitigates adverse effects on the environment.	The following comments are made: • The land subject to earthworks is not located within any overlays associated with natural heritage, mana whenua, natural resources, historic heritage or special character. Accordingly, it is not considered that the bulk earthworks will adversely affect the matters associated with these overlays. • A suite of erosion and sediment control measures in line with GD05 will be implemented on site to manage any potential adverse sediment discharge effects on the environment. Such measures include, but will not be limited to, new sediment retention pond, bunds and silt fences. The bulk earthworks are planned to be completed within one earthworks season to minimise the overall duration of exposed areas and the potential for adverse sedimentation effects on the environment. Together with the implementation of appropriate erosion and sediment control measures, it is considered that sediment runoff or discharge will be suitably mitigated and minimised. • Earthworks are anticipated to maintain the stability of surrounding land and structures as assessed in the Geotechnical Report.
(2) Sediment generation from land disturbance is minimised.	
(3) Land disturbance is controlled to achieve soil conservation.	
E11.3 Policies	
(1) Avoid where practicable, and otherwise mitigate, or where appropriate, remedy adverse effects on areas where there are natural and physical resources that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.	
(2) Manage land disturbance to:	

(a) retain soil and sediment on the land by the use of best practicable options for sediment and erosion control appropriate to the nature and scale of the activity; (a) manage the amount of land being disturbed at any one time, particularly where the soil type, topography and location is likely to result in increased sediment runoff or discharge; (b) avoid, remedy or mitigate adverse effects on accidentally discovered sensitive material; and (c) maintain the cultural and spiritual values of Mana Whenua in terms of land and water quality, preservation of wāhi tapu, and kaimoana gathering.	• There is one recorded archaeological sites in the Stage 2 area, Archaeological site R12/1125 – (Flanagan Homestead). Investigations and research undertaken by Clough & Associates note that there is potential for three identified areas within the site to contain additional archaeological sites and remnants. In this regard, archaeological monitoring of the areas identified in 'Figure 44' as shown in the Archaeological Assessment is proposed during earthworks within these areas. Archaeological monitoring will ensure any potential archaeological remains/evidence can be investigated.
(3) Manage the impact on Mana Whenua cultural heritage that is discovered undertaking land disturbance by: (a) requiring a protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin; (b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) undertaking appropriate measures to avoid adverse effects. Where adverse effects cannot be avoided, effects are remedied or mitigated.	
(4) Enable land disturbance necessary for a range of activities undertaken to provide for people and communities social, economic and cultural well-being, and their health and safety.	
(5) Design and implement earthworks with recognition of existing environmental site constraints and opportunities, specific engineering requirements, and implementation of integrated water principles.	

(6) Require that earthworks are designed and undertaken in a manner that ensures the stability and safety of surrounding land, buildings and structures. (a) Recognise and provide for the management and control of kauri dieback disease as a means of maintaining indigenous biodiversity.	
(7) Require any land disturbance that will likely result in the discharge of sediment laden water to a surface water body or to coastal water to demonstrate that sediment discharge has been minimised to the extent practicable, having regard to the quality of the environment; with: (a) any significant adverse effects avoided, and other effects avoided, remedied or mitigated, particularly in areas where there is: (i) high recreational use; (ii) relevant initiatives by Mana Whenua, established under regulations relating to the conservation or management of fisheries, including taiāpure, rāhui or whakatupu areas; (iii) the collection of fish and shellfish for consumption; (iv) maintenance dredging; or (v) a downstream receiving environment that is sensitive to sediment accumulation; (b) adverse effects avoided as far as practicable within areas identified as sensitive because of their ecological values, including terrestrial, freshwater and coastal ecological values; and (c) the receiving environments ability to assimilate the discharged sediment being taken into account.	
(8) Monitor the quality of fresh and coastal water bodies across the region and the effects of land disturbance on water quality and receiving environments.	

E12 Land Disturbance – District E12.2 Objectives	
(1) Land disturbance is undertaken in a manner that protects the safety of people and avoids, remedies or mitigates adverse effects on the environment.	Refer to comments made above in relation to E11 Land disturbance – Regional.
E12.3 Policies	
(1) Avoid where practicable, and otherwise, mitigate, or where appropriate, remedy adverse effects of land disturbance on areas where there are natural and physical resources that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.	
(2) Manage the amount of land being disturbed at any one time, to: (a) avoid, remedy or mitigate adverse construction noise, vibration, odour, dust, lighting and traffic effects; (b) avoid, remedy or mitigate adverse effects on accidentally discovered sensitive material; and (c) maintain the cultural and spiritual values of Mana Whenua in terms of land and water quality, preservation of wāhi tapu, and kaimoana gathering.	
(3) Enable land disturbance necessary for a range of activities undertaken to provide for people and communities social, economic and cultural well-being, and their health and safety.	
(4) Manage the impact on Mana Whenua cultural heritage that is discovered undertaking land disturbance by: (a) requiring a protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin;	

(b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) undertaking appropriate measures to avoid adverse effects, or where adverse effects cannot be avoided, effects are remedied or mitigated.	
(5) Design and implement earthworks with recognition of existing environmental site constraints and opportunities, specific engineering requirements, and implementation of integrated water principles.	
(6) Require that earthworks are designed and undertaken in a manner that ensures the stability and safety of surrounding land, buildings and structures.	
E15 Vegetation Management and biodiversity E15.2 Objectives	
(1) Ecosystem services and indigenous biological diversity values, particularly in sensitive environments, and areas of contiguous indigenous vegetation cover, are maintained or enhanced while providing for appropriate subdivision, use and development.	The Ecological Assessment at **Appendix 15** confirms there is very little indigenous vegetation within the site, due to the rural land use activities. The proposal involves indigenous riparian planting, which will contribute to improved ecosystem services and indigenous biological diversity values in this part of Auckland.
(2) Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.	
E15.3 Policies	
(1) Protect areas of contiguous indigenous vegetation cover and vegetation in sensitive environments including the coastal environment, riparian margins, wetlands, and areas prone to natural hazards.	
(2) Manage the effects of activities to avoid significant adverse effects on biodiversity values as far as practicable, minimise significant adverse effects where avoidance is not practicable, and avoid, remedy or mitigate any other adverse effects on indigenous biological diversity and	Vegetation removal within the site is largely limited to exotic species which are not of high ecological value. Where approximately 350m^2 of riparian vegetation along the Hingaia Stream is required for removal, new riparian planting within riparian margins will be undertaken. The EIA notes that approximately one-fifth of the Stage 2 site will consist of planted landscape features. The ecological

ecosystem services, including soil conservation, water quality and quantity management, and the mitigation of natural hazards.	value of these areas in the medium to long term are considered to reduce the magnitude of effect of the permanent vegetation loss to 'low'. This is discussed in greater detail within the Ecological Impact Assessment as Appendix 15.
(3) Encourage the offsetting of any significant residual adverse effects on indigenous vegetation and biodiversity values that cannot be avoided, remedied or mitigated, through protection, restoration and enhancement measures, having regard to Policy E15.3(4) below and Appendix 8 Biodiversity offsetting.	As discussed in depth within the Ecological Impact Assessment, vegetation to be removed will be adequately offset by additional planting.
(4) Protect, restore, and enhance biodiversity when undertaking new use and development through any of the following: (a) using transferable rural site subdivision to protect areas that meet one or more of the factors referred to in B7.2.2(1) and in Schedule 3 Significant Ecological Areas -Terrestrial Schedule or shown on the Kawau Island Rural Subdivision SEA Control. (b) requiring legal protection, ecological restoration and active management techniques in areas set aside for the purposes of mitigating or offsetting adverse effects on indigenous biodiversity; or (c) linking biodiversity outcomes to other aspects of the development such as the provision of infrastructure and open space.	The existing waterways to be retained are proposed to be enhanced through riparian planting which are to be protected in perpetuity.
(5) Enable activities which enhance the ecological integrity and functioning of areas of vegetation, including for biosecurity, safety and pest management and to control kauri dieback	N/A – not relevant to proposal
(6) Enable vegetation management to provide for the operation and routine maintenance needs of activities.	
(7) Manage any adverse effects from the use, maintenance, upgrading and development of infrastructure in accordance with the policies in E15.3,	Except for the arch culvert, infrastructure will not be located in areas with indigenous biodiversity values.

recognising that it is not always practicable to locate or design infrastructure to avoid areas with indigenous biodiversity values.	
(8) Recognise and provide for the management and control of kauri dieback as a means of maintaining indigenous biodiversity.	N/A – there are no kauri located within the site
(9) Avoid activities in the coastal environment where they will result in any of the following: (a) non-transitory or more than minor adverse effects on: (i) threatened or at risk indigenous species (including Maui's Dolphin and Bryde's Whale); (ii) the habitats of indigenous species that are at the limit of their natural range or which are naturally rare; (iii) threatened or rare indigenous ecosystems and vegetation types, including naturally rare ecosystems and vegetation types; (iv) areas containing nationally significant examples of indigenous ecosystems or indigenous community types; or (v) areas set aside for full or partial protection of indigenous biodiversity under other legislation, including the West Coast North Island Marine Mammal Sanctuary. (b) any regular or sustained disturbance of migratory bird roosting, nesting and feeding areas that is likely to noticeably reduce the level of use of an area for these purposes; (c) the deposition of material at levels which would adversely affect the natural ecological functioning of the area; or (d) fragmentation of the values of the area to the extent that its physical integrity is lost.	N/A – the site is not located within coastal environment

(10) Avoid (while giving effect to Policy E15(9) above) activities in the coastal environment which result in significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities, on: (a) areas of predominantly indigenous vegetation; (b) habitats that are important during the vulnerable life stages of indigenous species; (c) indigenous ecosystems and habitats that are found only in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh; (d) habitats of indigenous species that are important for recreational, commercial, traditional or cultural purposes including fish spawning, pupping and nursery areas; (e) habitats, including areas and routes, important to migratory species; (f) ecological corridors, and areas important for linking or maintaining biological values; or (g) water quality such that the natural ecological functioning of the area is adversely affected.	N/A – the site is not located within the coastal environment
E23 Signs E23.2 Objectives	
(1) Appropriate billboards and comprehensive development signage contribute to the social and economic well-being of communities through identifying places, providing information including for convenience and safety purposes, and advertising goods and services.	Signage plans are provided for within the Architectural Drawings as **Appendix 6**. Their positioning, size and design will not cover significant architectural features, and ensures that signage will not detract from the architectural response proposed or appear overly dominant in the surrounding environment

(2) Billboards and comprehensive development signage are managed to maintain traffic and pedestrian safety, historic heritage values and the visual amenity values of buildings and the surrounding environment.	
E23.3 Policies	
(1) Require billboards and comprehensive development signage to meet the relevant permitted activity standards (for example building height) that apply in the zone in which they are located.	Proposed signage will be provided on building facades and as such, are considered to meet the permitted activity standards.
(2) Require the placement, location and size of billboards and comprehensive development signage on buildings to not significantly detract from the profile or appearance of a building, or cover any significant architectural features on the façade of a building.	Architectural plans demonstrate the design of proposed signage across the development. They also include signage plans for each of the proposed lots. The positioning, size and design of signage and larger electronic signs will not cover significant architectural features. Signage is not considered to detract from the architectural response proposed or appear overly dominant in the surrounding environment.
(3) Enable billboards and comprehensive development signage while avoiding signs creating clutter or dominating the building or environment by controlling the size, number and location of signs.	
(4) Require traffic and pedestrian safety standards to apply to billboards and comprehensive development signage, particularly to the wording, lighting and location of signs, and changeable message, illuminated, flashing or revolving signs.	Architectural plans demonstrate the design of proposed signage across the development, with specific designs to be provided as part of future resource consents as required by future tenants and retailers. LED signage as proposed will be provided for in areas where it is considered to have limited visual effect.
(5) Manage the effects of billboards and comprehensive development signage to maintain the values of scheduled historic heritage places and visual amenity values.	The positioning, size and design of signage will not cover significant architectural features, and ensures that signage will not detract from the architectural response proposed or appear overly dominant in the surrounding environment.
(6) Limit the duration of consents for billboards where future land use and/or transport network changes are likely to result in the billboard being inappropriate from a site development or traffic safety perspective.	Architectural plans demonstrate the design of proposed signage across the development. They also include signage plans for each of the proposed lots. This has established a clear signage strategy which will be integrated into the overall façade designs. As such, the signage has been designed in consideration of the future land use and are not considered to be inappropriate.
E25 Noise and Vibration E25.2 Objectives	

(1) People are protected from unreasonable levels of noise and vibration.	The Acoustic Report prepared by Styles Group notes that anticipated noise and vibration effects from the project are expected to be reasonable.
(2) The amenity values of residential zones are protected from unreasonable noise and vibration, particularly at night.	
(3) Existing and authorised activities and infrastructure, which by their nature produce high levels of noise, are appropriately protected from reverse sensitivity effects where it is reasonable to do so.	
(4) Construction activities that cannot meet noise and vibration standards are enabled while controlling duration, frequency and timing to manage adverse effects.	
E25.3. Policies	
(1) Set appropriate noise and vibration standards to reflect each zone's function and permitted activities, while ensuring that the potential adverse effects of noise and vibration are avoided, remedied or mitigated.	
(2) Minimise, where practicable, noise and vibration at its source or on the site from which it is generated to mitigate adverse effects on adjacent sites.	
(3) Encourage activities to locate in zones where the noise generated is compatible with other activities and, where practicable, adjacent zones.	
(4) Use area or activity specific rules where the particular functional or operational needs of the area or activity make such rules appropriate	
(5) Prevent significant noise-generating activities other than roads and railway lines from establishing in or immediately adjoining residential zones.	

Construction, demolition and maintenance activities (10) Avoid, remedy or mitigate the adverse effects of noise and vibration from construction, maintenance and demolition activities while having regard to: (a) the sensitivity of the receiving environment; and (a) the proposed duration and hours of operation of the activity; and (b) the practicability of complying with permitted noise and vibration standards.	
E26 Infrastructure E26.2.1 Objectives	
(1) The benefits of infrastructure are recognised.	The proposed integrated transport network will provide benefits as outlined within the ITA.
(2) The value of investment in infrastructure is recognised.	
(3) Safe, efficient and secure infrastructure is enabled, to service the needs of existing and authorised proposed subdivision, use and development.	This proposal will be adequately serviced utilising both existing bulk infrastructure in place, and through the delivery of new infrastructure. Several options for infrastructure have been considered and the proposed servicing strategy is considered to be the most efficient. Existing infrastructure will be utilised where possible. The existing road network will be retained and upgraded as necessary. Local water supply, stormwater and wastewater infrastructure within the project area itself will be provided by the applicant.
(4) Development, operation, maintenance, repair, replacement, renewal, upgrading and removal of infrastructure is enabled.	The proposal will provide fit-for-purpose new infrastructure as set out in the application material.
(5) The resilience of infrastructure is improved and continuity of service is enabled.	

(6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.	Refer to comments in relation to B3.2.1(7).
(7) The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance, repairs, upgrading and removal is enabled.	
E26.2.2 Policies	
(1) Recognise the social, economic, cultural and environmental benefits that infrastructure provides, including: (a) enabling enhancement of the quality of life and standard of living for people and communities; (b) providing for public health and safety; (c) enabling the functioning of businesses; (d) enabling economic growth; (e) enabling growth and development; (f) protecting and enhancing the environment; (g) enabling the transportation of freight, goods, people; and (h) enabling interaction and communication.	Infrastructure is proposed in accordance with a comprehensive urban development, and will accordingly provide benefits associated with the construction of, and the ongoing use/occupation of the development.
(2) Provide for the development, operation, maintenance, repair, upgrade and removal of infrastructure throughout Auckland by recognising: (a) functional and operational needs; (b) location, route and design needs and constraints; (c) the complexity and interconnectedness of infrastructure services; (d) the benefits of infrastructure to communities with in Auckland and beyond;	Refer to comments in relation to E26.2.1(4).

(e) the need to quickly restore disrupted services; and E26 Infrastructure Auckland Unitary Plan Operative in part 5 (f) its role in servicing existing, consented and planned development.	
Adverse effects on infrastructure (3) Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.	The proposal will not hinder the ability for existing infrastructure and servicing networks to operate. It is considered that adverse servicing and infrastructure capacity effects will be mitigated to be less than minor.
Adverse effects of infrastructure (4) Require the development, operation, maintenance, repair, upgrading and removal of infrastructure to avoid, remedy or mitigate adverse effects, including, on the: (a) health, well-being and safety of people and communities, including nuisance from noise, vibration, dust and odour emissions and light spill; (b) safe and efficient operation of other infrastructure; (c) amenity values of the streetscape and adjoining properties; (d) environment from temporary and ongoing discharges; and (e) values for which a site has been scheduled or incorporated in an overlay.	Infrastructure is proposed to service a master planned urban development which will provide regionally significant benefits. • Mitigation measures in place in accordance with a CNVMP are proposed to ensure adverse effects on persons and the environment are appropriately mitigated. • It is considered that proposed infrastructure will be safe and efficient. • It is considered that proposed infrastructure will not have any adverse effects on the amenity value of the streetscape and adjoining properties. • For the reasons outlined within Section 10.9 of the AEE, the proposed stormwater discharges will not have adverse effects on the environment. • The site is not subject to any relevant overlay.
(5) Consider the following matters when assessing the effects of infrastructure: (a) the degree to which the environment has already been modified; (b) the nature, duration, timing and frequency of the adverse effects; (c) the impact on the network and levels of service if the work is not undertaken;	

(d) the need for the infrastructure in the context of the wider network; and (e) the benefits provided by the infrastructure to the communities within Auckland and beyond.	
(6) Consider the following matters where new infrastructure or major upgrades to infrastructure are proposed within areas that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character: (a) the economic, cultural and social benefits derived from infrastructure and the adverse effects of not providing the infrastructure; (b) whether the infrastructure has a functional or operational need to be located in or traverse the proposed location; (c) the need for utility connections across or through such areas to enable an effective and efficient network; (d) whether there are any practicable alternative locations, routes or designs, which would avoid, or reduce adverse effects on the values of those places, while having regard to E26.2.2(6)(a) - (c); (e) the extent of existing adverse effects and potential cumulative adverse effects; (f) how the proposed infrastructure contributes to the strategic form or function, or enables the planned growth and intensification, of Auckland; (g) the type, scale and extent of adverse effects on the identified values of the area or feature, taking into account: (i) scheduled sites and places of significance and value to Mana Whenua;	N/A – not relevant to proposal

(ii) significant public open space areas, including harbours; (iii) hilltops and high points that are publicly accessible scenic lookouts; (iv) high-use recreation areas; (v) natural ecosystems and habitats; and (vi) the extent to which the proposed infrastructure or upgrade can avoid adverse effects on the values of the area, and where these adverse effects cannot practicably be avoided, then the extent to which adverse effects on the values of the area can be appropriately remedied or mitigated. (h) whether adverse effects on the identified values of the area or feature must be avoided pursuant to any national policy statement, national environmental standard, or regional policy statement.	
(7) Enable the following activities within natural heritage, natural resources, coastal environment, historic heritage, special character and Mana Whenua cultural heritage overlays: (a) the use and operation of existing infrastructure; and (b) the minor upgrading, maintenance and repair of existing infrastructure, while ensuring that the adverse effects on the values of the area are avoided and where those effects cannot practicably be avoided, minimise any such effects and ensure they are appropriately remedied or mitigated.	N/A – not relevant to proposal
(8) Encourage new linear infrastructure to be located in roads, and where practicable within the road reserve adjacent to the carriage way.	New infrastructure will be located within road reserves where possible
Undergrounding of infrastructure in urban areas (9) Require new or major upgrades to electricity and telecommunications lines to be located underground in urban areas unless:	New electricity and telecommunication lines will be located underground

(a) there are significant operational, functional, technical or economic reasons that require an aboveground network; or (b) the additional lines are part of minor upgrading to the network or are service connections.	
(10) Enable the coordinated undergrounding of existing electricity and telecommunications lines in the road, particularly where the opportunity exists when network improvements are undertaken.	
New Technologies (11) Provide flexibility for infrastructure operators to use new technological advances that: (a) improve access to, and efficient use of services; (b) allow for the re-use of redundant services and structures where appropriate; (c) result in environmental benefits and enhancements; and (d) utilise renewable sources.	N/A – not relevant to proposal
Renewable electricity generation *(12)* Provide for renewable electricity generation activities to occur at different scales and from different sources, including small and community-scale renewable electricity generation activities.	
National Grid *(13)* Have regard to the extent to which actual and potential effects have been avoided, remedied or mitigated by the route, site and method selected when assessing the development of the National Grid.	

Road Network (14) Require road network activities to: (a) avoid, remedy or mitigate adverse effects on residential or other sensitive activities, including effects of vibration, noise, glare and vehicle emissions; (b) avoid, remedy or mitigate adverse effects on amenity values of adjoining properties and the streetscape; and (c) maintain or enhance the safety and efficiency of the transport network.	The proposed road network is not considered to have adverse effects on any residential or sensitive activities, has been designed to integrate with the existing road network including those consented as part of Stage 1 and is considered to be safe and efficient.
(15) Ensure roads are designed, located and constructed to: (a) provide for the needs of all road users and modes of transport; (b) avoid, remedy or mitigate adverse effects on amenity values of adjoining properties; (c) avoid, remedy or mitigate adverse construction effects including effects of vibration, noise, and dust; (d) avoid, remedy or mitigate adverse operational effects particularly on residential or other sensitive activities, including effects of vibration, noise, glare and vehicle emissions; (e) minimise severance effects and changes to drainage patterns; and (f) maintain or enhance the safety and efficiency of the transport network	This policy has been assessed below – refer to E27 objectives and policies assessment.
E27 Transport E27.2 Objectives	
(1) Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and	The proposal is considered to provide for an integrated transport network with public transport, vehicular, cycling and walking transport modes provided for within the development. The development has also been comprehensively

(b) the adverse effects of traffic generation on the transport network to be managed.	designed to provide cycling and walking connections beyond the site. Refer to the Integrated Transport Assessment as **Appendix 16**.
(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.	
(3) Parking and loading is managed to support urban growth and the quality compact urban form. PC79 E27.2(3) Parking, including accessible car parking and loading supports urban growth, and a quality compact urban form.	Parking will be provided in accordance with the AUP (OP) requirements. At least one carpark will be provided for each dwelling (with the exception of one apartment where no carpark is provided), such that parking doesn't dominate the site or result in large areas of unnecessary paving. On-street parking is also provided in appropriate places. Compliant accessible parking spaces will be provided.
(4) Parking, loading and access is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options of the location.	Parking and access will be safe and efficient, as discussed within the Integrated Transport Assessment Report attached as **Appendix 16**.
PC79 E27.2.(4) Parking, including accessible car parking, loading and access is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options of the location.	Parking and access will be safe and efficient. At least one carpark will be provided for each dwelling (with the exception of one apartment where no carpark is provided) in the Stage 2 Area. This is considered to be appropriate given the character, and on-street parking is provided as appropriate. The required dimensions for accessible parking spaces will be provided for within the development.
(5) Pedestrian safety and amenity along public footpaths is prioritised.	JOALs have been provided to minimise vehicle crossings, and provide for vehicles exiting and entering sites in a forward direction in these areas. All proposed vehicle crossings (with the exception of one crossing) comply with the minimum separation distance requirements, providing for pedestrian refuge.

E27.2.(5A) Safe, and direct, and continuous on-site access for pedestrian and other users is provided to dwellings, in residential zones.	N/A – the site is not located in residential zones.
(6) Road/rail crossings operate safely with neighbouring land use and development.	N/A – not relevant to proposal
PC79 E27.2.(7) Electric Vehicle Supply Equipment is enabled to facilitate use of electric vehicles.	Any undercover parking spaces will have capability to install electric vehicle supply equipment.
E27.3 Policies	
(1) Require subdivision, use and development which: (a) generate trips resulting in potentially more than minor adverse effects on the safe, efficient and effective operation of the transport network; (b) are proposed outside of the following zones: (i) the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone; (ii) Residential – Terrace Housing and Apartment Buildings Zone; (iii) the Centre Fringe Office Control as shown on the planning maps; or (c) do not already require an integrated transport assessment or have been approved based on an integrated transport assessment to manage adverse effects on and integrate with the transport network by measures such as travel planning, providing alternatives to private vehicle trips, staging development or undertaking improvements to the local transport network.	An ITA has been provided and is included at Appendix 16. The ITA addresses the adverse effects of the proposal on the transport network, and provides a detailed explanation of roading proposed in order to accommodate the development.
(2) Require major proposals for discretionary consent to prepare an integrated transport assessment including provision for pedestrians, cyclists, public transport users, freight and motorists.	An ITA has been provided.

Parking (3) Manage the number, location and type of parking and loading spaces, including bicycle parking and associated end-of-trip facilities to support all of the following: (a) the safe, efficient and effective operation of the transport network; (b) the use of more sustainable transport options including public transport, cycling and walking; (c) the functional and operational requirements of activities; (d) the efficient use of land; (e) the recognition of different activities having different trip characteristics; and (f) the efficient use of on-street parking	All parking spaces will be designed to comply with the AUP (OP) requirements. An appropriate number of parking spaces have been provided to the large format retail, residential dwellings, commercial and community buildings. It is considered that the proposed carparks represent an efficient use of land and do not result in large parking areas. On-street parking is selectively provided where appropriate.
PC79 E27.3(3) Manage the number, location and type of parking, including accessible car parking, and loading spaces, including bicycle parking and associated end-of-trip facilities to support all of the following: full participation in society for people with disabilities that impact on mobility	Appropriate carparking and bicycle parking is provided for, as discussed within the ITA.
(4) Limit the supply of on-site parking in the Business – City Centre Zone to support the planned growth and intensification and recognise the existing and future accessibility of this location to public transport, and support walking and cycling.	N/A – not relevant to proposal

(5) Limit the supply of on-site parking for office development in all locations to: (a) minimise the growth of private vehicle trips by commuters travelling during peak periods; and (b) support larger-scale office developments in the Business – City Centre Zone, Centre Fringe Office Control area, Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Business Park Zone.	The proposed on-site parking will be provided in compliance with the required maximum rates for office GFA.
(6) Provide for flexible on-site parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone (with the exception of specified non-urban town and local centres and Mixed Use Zone adjacent to those specified centres) by not providing limits on parking for subdivision, use and development other than for office activities, education facilities and hospitals. (a) [deleted] (b) [deleted] (6A) Encourage activities providing no or reduced on-site parking (other than other for accessible parking) where it will enable better built form outcomes. (6B) Encourage the use of public transport, walking and cycling trips and manage effects on the safe and efficient operation of the transport network by limiting the supply of on-site parking for office activities, education facilities and hospitals in the Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone and Business – Mixed Use Zone.	

(9) Provide for flexible approaches to parking, which use land and parking spaces more efficiently, and reduce incremental and individual parking provision.	Each dwelling will be provided at least one carpark will be provided for each dwelling (with the exception of one apartment where no carpark is provided). The ITA considers that appropriate parking facilities have been provided throughout the site to appropriately serve the proposed retail and commercial development within each block of the site.
(10) Provide for non-accessory parking where: (a) the proposal and the type of parking will reinforce the efficient use of land or planned growth and intensification provided for in this plan for the site or locality; and (b) there is an undersupply or projected undersupply of parking to service the area having regard to all of the following: (i) the efficient use of land to rationalise or consolidate parking resources in centres; (ii) the availability of alternative transport modes, particularly access to the existing and planned public transport; (iii) the type of parking proposed; (iv) existing parking survey information; and (v) the type of activities in the surrounding area and their trip characteristics.	N/A – not relevant to proposal
(11) Discourage the development of long-term non-accessory parking in the Business – City Centre Zone and the Centre Fringe Office Control as shown on the planning maps to: (a) recognise and support the high level of accessibility these areas have to the public transport; and (b) minimise the growth in private vehicle trips by commuters during peak periods.	N/A – not relevant to proposal
(12) Control the development of long-term non-accessory parking in the Business – Metropolitan Centre Zone, Business – Town Centre Zone,	Long-term non-accessory parking is not proposed.

Business – Local Centre Zone and in the Business – Mixed Use Zone so that the parking does not undermine: (a) the efficient use of land or growth and intensification provided for in this plan for the site or locality; and (b) the use of public transport in these zones.	
(13) Provide for park-and-ride and public transport facilities which are located and designed to support the public transport network by: (a) locating in proximity to public transport stations, stops and terminals; (b) growing public transport patronage to assist in relieving congested corridors by encouraging commuters to shift to public transport; (c) making public transport easier and more convenient to use, thereby attracting new users; (d) improving the operational efficiency of the public transport network;	N/A – not relevant to proposal
(14) Support increased cycling and walking by: (a) requiring larger developments to provide bicycle parking; (b) requiring end-of-trip facilities, such as showers and changing facilities, to be included in office, educational and hospital developments with high employee or student numbers; and (c) providing for off-road pedestrian and bicycle facilities to complement facilities located within the road network.	The proposed bicycle parking provision are spread throughout the site to make it more user-friendly, and meet the minimum requirement for each individual lot, hence achieving overall compliance with the requirements outlined in the AUP and the Drury Centre Precinct provision requirements.
Loading (15) Require access to loading facilities to support activities and minimise disruption on the adjacent transport network.	The vehicle tracking in the ITA undertaken at the access of each lot demonstrates that vehicle crossings can be suitably formed to allow for efficient and safe manoeuvring of loading vehicles while maintaining a 0.5m buffer between the vehicle and any adjacent walls/fences/vehicles.

(16) Provide for on-site or alternative loading arrangements, including on-street loading or shared loading areas, particularly in locations where it is desirable to limit access points for reasons of safety, amenity and road operation.	On-site loading is provided where required in accordance with the AUP (OP) requirements and commensurate with the associated activity.
Design of parking and loading (17) Require parking and loading areas to be designed and located to: (a) avoid or mitigate adverse effects on the amenity of the streetscape and adjacent sites; (b) provide safe access and egress for vehicles, pedestrians and cyclists; (c) avoid or mitigate potential conflicts between vehicles, pedestrians and cyclists; and (d) in loading areas, provide for the separation of service and other vehicles where practicable having regard to the functional and operational requirements of activities.	As noted in the ITA, design of parking spaces will avoid adverse effects on the streetscape and safety of vehicles, pedestrians and cyclists. Vehicle crossings will maintain compliant separation distances from each other. All parking spaces will be provided with safe access and egress and have been designed with clear sightlines to reduce potential conflicts between vehicles, pedestrian and cyclists.
(18) Require parking and loading areas to be designed so that reverse manoeuvring of vehicles onto or off the road does not occur in situations which will compromise: (a) the effective, efficient and safe operation of roads, in particular arterial roads; (b) pedestrian safety and amenity, particularly within the centre zones and Business – Mixed Use Zone; and (c) safe and functional access taking into consideration the number of parking spaces served by the access, the length of the driveway and whether the access is subject to a vehicle access restriction.	
(19) Require park-and-ride, non-accessory parking and off-site parking facilities and their access points to:	N/A – not relevant to proposal

(a) be compatible with the planning and design outcomes identified in this plan for the relevant zone;

(b) take into account the implementation of any relevant future transport projects or changes to the transport network identified in any statutory document (including the Long Term Plan or Regional Land Transport Plan) where implementation is likely;

(c) be accessible, safe and secure for users with safe and attractive pedestrian connections within the facility and to adjacent public footpaths;

(d) provide an attractive interface between any buildings, structures or atgrade parking areas and adjacent streets and public open spaces. Depending on location and scale, this may include:

  (i) maintaining an active frontage through sleeving and/or an interesting appearance through use of architectural treatments so that the facility contributes positively to the pedestrian amenity and to any retail, commercial or residential uses along the road it fronts;

  (ii) appropriate screening, such as exterior panelling, for any parking building; and

  (iii) planting and other landscaping.

(e) provide for any buildings to be adapted or readily dismantled for other uses if no longer required for parking. In particular, the floor-to-ceiling height of a parking building at street level should be capable of conversion to other activities provided for in the zone; and

(f) be managed and operated so that the facility avoids adverse effects on the efficient, effective and safe operation of the transport network including:

  (i) the safety of pedestrians and cyclists;

(ii) amenity for pedestrians; (iii) queuing on the road and conflict at access points to the facility; and (iv) the operation of public transport services and related infrastructure.	
Access (20) Require vehicle crossings and associated access to be designed and located to provide for safe, effective and efficient movement to and from sites and minimise potential conflicts between vehicles, pedestrians, and cyclists on the adjacent road network.	As noted in the IT, new vehicle crossings and access associated with proposed dwellings will avoid adverse effects on the streetscape and safety of vehicles, pedestrians and cyclists. The vehicle crossings and access within 10m of an intersection have been assessed in the ITA and these will be designed to provide for safe, effective and efficient movement to and from sites.
PC79 E27.3.(20A) Require vehicle accesses to be designed and located to provide for low speed environments and for the safety of pedestrians and other users, and functional access for emergency responders.	
(21) Restrict or manage vehicle access to and from sites adjacent to intersections, adjacent motorway interchanges, and on arterial roads, so that: (a) the location, number, and design of vehicle crossings and associated access provides for the efficient movement of people and goods on the road network; and (b) any adverse effect on the effective, efficient and safe operation of the motorway interchange and adjacent arterial roads arising from vehicle access adjacent to a motorway interchange is avoided, remedied or mitigated.	As noted in the ITA, vehicle accesses adjacent to intersections, motorway interchanges and arterial roads have been minimised where possible. Where crossings are located within proximity, it is considered that vehicles will be travelling at appropriate speeds such that adverse effects are considered to be avoided.
(22) Restrict vehicle access across the Vehicle Access Restriction – General Control as shown on the planning maps within the Business – City Centre Zone to:	N/A – not relevant to proposal

(a) give high priority to pedestrian movement, safety and amenity along the main pedestrian streets in the Business – City Centre Zone; and (b) provide for continuity of building frontage and associated activities at street level.	
(23) Provide for the continued use of existing vehicle access affected by the Key Retail Frontage Control as shown on the planning maps and Vehicle Access Restriction – General Control in the Business – City Centre Zone where the effects of the activity and use of the vehicle access are the same or similar in character, intensity and scale which existed on 30 September 2013.	
(24) Control alterations to or rationalisation of existing vehicle access affected by the Key Retail Frontage Control and Vehicle Access Restriction – General Control in the Business – City Centre Zone where there is a change in the character, intensity or scale of the activity and use of the existing vehicle access.	
(25) Discourage new vehicle access across the Key Retail Frontage Control in the Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Mixed Use Zone to: (a) give high priority to pedestrian movement, safety and amenity; and (b) provide for continuity of building frontage and associated activities at street level.	
(26) Limit new vehicle access across the General Commercial Frontage Control as shown on the planning maps in the Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Mixed Use Zone to: (a) support pedestrian safety and amenity; and	

(b) provide for continuity of building frontage and associated activities at street level.	
Sightlines to rail level crossings (27) Limit the location of buildings and other visual obstructions within the sightline areas of road/rail level crossings.	
(28) Discourage new road and pedestrian rail level crossings to ensure the safe, effective and efficient operation of the region's rail network.	
Access to rail level crossing (29) Control vehicle access to sites adjacent to all road/rail level crossings to improve safety for road users on the approach to level crossings.	
PC79 E27.3.(30) Electric vehicle charging Enable provision for Electric Vehicle Supply Equipment for new residential unit developments that provide carparking.	It is considered that dwelling garages will have the capacity to support EV charging in the future if required.
E30 Contaminated Land E30.2 Objective	
(1) The discharge of contaminants from contaminated land into air, or into water, or onto or into land are managed to protect the environment and human health and to enable land to be used for suitable activities now and in the future.	The proposal will meet these provisions as the discharge of contaminants from contaminated land into air, water or into land will be managed to protect the environment and human health via the measures outlined in the RAP. The remediation of contaminated areas on the site in accordance with the RAP will enable the land to be used and developed for planned urban purposes.
E30.3 Policies	
(1) Identify and record the details of land containing elevated levels of contaminants in a public register.	The proposal will meet these provisions as the discharge of contaminants from contaminated land into air, water or into land will be managed to protect the environment and human health via the measures outlined in the RAP. The remediation of contaminated areas on the site in accordance with the RAP will enable the land to be used and developed for planned urban purposes.
(2) Require any use or development of land containing elevated levels of contaminants resulting in discharges to air, land or water to manage or remediate the contamination to a level that:	

(a) allows contaminants to remain in the ground/groundwater, where it can be demonstrated that the level of residual contamination is not reasonably likely to pose a significant adverse effect on human health or the environment; and (b) avoids adverse effects on potable water supplies; and (c) avoids, remedies or mitigates significant adverse effects on ecological values, water quality, human health and amenity values; (d) while taking into account all of the following: the physical constraints of the site and operational practicalities; (e) the financial implications of the investigation, remediation, management and monitoring options; (f) the use of best practice contaminated land management, including the preparation and consideration of preliminary and detailed site investigations, remedial action plans, site validation reports and site management plans for the identification, monitoring and remediation of contaminated land; and (g) whether adequate measures are in place for the transport, disposal and tracking of contaminated soil and other contaminated material removed from a site to prevent adverse effects on the environment.	

E36.3 Policy	
General (1) Identify land that may be subject to natural hazards, taking into account the likely effects of climate change, including all of the following: (a) coastal hazards (including coastal erosion and coastal storm inundation, excluding tsunami); (b) flood hazards;	The land is identified as being subject to flooding and land instability.

(c) land instability; and (d) wildfires.	
(2) Investigate other natural hazards to assess whether risks to people, property or the environment should be managed through the Plan or otherwise.	No other natural hazards are considered relevant to the proposal
(3) Consider all of the following, as part of a risk assessment of proposals to subdivide, use or develop land that is subject to natural hazards: (a) the type, frequency and scale of the natural hazard and whether adverse effects on the development will be temporary or permanent; (b) the type of activity being undertaken and its vulnerability to natural hazard events; (c) the consequences of a natural hazard event in relation to the proposed activity; (d) the potential effects on public safety and other property; (e) any exacerbation of an existing natural hazard risk or the emergence of natural hazard risks that previously were not present at the location; (f) whether any building, structure or activity located on land subject to natural hazards near the coast can be relocated in the event of severe coastal erosion, inundation or shoreline retreat; (g) the ability to use non-structural solutions, such as planting or the retention or enhancement of natural landform buffers to avoid, remedy or mitigate hazards, rather than hard protection structures; (h) the design and construction of buildings and structures to mitigate the effects of natural hazards; (i) the effect of structures used to mitigate hazards on landscape values and public access;	This policy is considered met for the reasons set out in B10.2.2(5). The Flooding and Geotechnical reports confirm that any flooding land instability effects will be avoided or mitigated.

(j) site layout and management to avoid or mitigate the adverse effects of natural hazards, including access and exit during a natural hazard event; and (k) the duration of consent and how this may limit the exposure for more or less vulnerable activities to the effects of natural hazards including the likely effects of climate change.	
(4) Control subdivision, use and development of land that is subject to natural hazards so that the proposed activity does not increase, and where practicable reduces, risk associated with all of the following adverse effects: (a) accelerating or exacerbating the natural hazard and/or its potential impacts; (b) exposing vulnerable activities to the adverse effects of natural hazards; (c) creating a risk to human life; and (d) increasing the natural hazard risk to neighbouring properties or infrastructure.	The development has been managed so as to avoid the construction of buildings on land affected by floodplains or overland flow paths. The development has, where practicable, reduced risks associated with accelerating or exacerbating the natural flood hazard and its potential impacts and the exposure of vulnerable activities to the risk of natural hazards.
Coastal hazards (including coastal erosion and coastal storm inundation) (5) Ensure that subdivision, use and development on rural land for rural uses and in existing urban areas subject to coastal hazards avoids or mitigates adverse effects resulting from coastal storm inundation, coastal erosion and sea level rise of 1m through location, design and management.	Development has avoided locating buildings on areas subject to coastal inundation hazard areas, which are contained within the Hingaia Stream.
(6) Avoid subdivision, use and development in greenfield areas which would result in an increased risk of adverse effects from coastal hazards, taking account of a longer term rise in sea level.	
(7) Ensure that buildings in areas subject to coastal hazards are located and designed to minimise the need for hard protection structures.	

(8) Ensure that when locating any new infrastructure in areas potentially subject to coastal hazards consider, where appropriate, an adaptive management response taking account of a longer term rise in sea level.	
(9) Require habitable areas of new buildings and substantial additions, alterations, modifications or extensions to existing buildings located in coastal storm inundation areas to be above the 1 per cent annual exceedance probability (AEP) coastal storm inundation event including an additional sea level rise of 1m.	
Defences against coastal hazards (10) Avoid the modification, alteration or removal of sand dunes and vegetation on sand dunes which would compromise their function as natural defences for an area subject to coastal hazards and ensure adverse effects on wider coastal processes are avoided or mitigated.	
(11) Consider hard protection works to protect development only where existing natural features will not provide protection from the natural hazard and enhancement of natural defences is not practicable.	

(12) Require hard protection works involving the placement of any material, objects or structures in or on any area located above mean high water springs to be designed and located to avoid, remedy or mitigate adverse environmental effects including all of the following: (a) location of structures as far landward as possible to retain as much natural beach buffer as possible; (b) any likely increase in the coastal hazard, including increased rates of erosion, accretion, subsidence or slippage; (c) undermining of the foundations at the base of the structure; (d) erosion in front of, behind or around the ends or down-drift of the structure; (e) settlement or loss of foundation material; (f) movement or dislodgement of individual structural elements; (g) offshore or long-shore loss of sediment from the immediate vicinity; (h) long-term adverse visual effects on coastal landscape and amenity values; and (i) effects on public access.	
Floodplains in urban areas	New buildings will be located outside of the 1% AEP flood plain.

(13) In existing urban areas require new buildings designed to accommodate more vulnerable activities to be located: (a) outside of the 1 per cent annual exceedance probability (AEP) floodplain; or (b) within or above the 1 per cent annual exceedance probability (AEP) floodplain where safe evacuation routes or refuges are provided.	
(14) Require redevelopment of sites where existing more vulnerable activities are located within the 1 per cent annual exceedance probability (AEP) floodplain to address all of the following: (a) minimise risks from flood hazards within the site; (b) minimise the risks from flood hazards to people and property upstream and downstream of the site; (c) remedy or mitigate where practicable or contribute to remedying or mitigating flood hazards in the 1 per cent annual exceedance probability floodplain; (d) location of habitable rooms above flood levels; and (e) provide safe evacuation routes or refuges from buildings and sites.	New buildings will be located outside of the 1% AEP flood plain, flood hazard risks will be minimised. The flood modelling shows that the development will not result in any increased flooding risk. Refer to the Stormwater Assessment in Appendix 11.
(15) Within existing urban areas, enable buildings containing less vulnerable activities to locate in the 1 per cent annual exceedance probability (AEP) floodplains where that activity avoids, remedies or mitigates effects from flood hazards on other properties.	
Floodplains in rural areas (16) In rural areas, avoid where practicable locating buildings accommodating more vulnerable activities in the 1 per cent annual exceedance probability (AEP) floodplain and manage other buildings and structures so that flood hazards are not exacerbated	N/A – the land is to be developed for medium density residential use.

Floodplains in greenfield areas (17) On greenfield land outside of existing urban areas, avoid locating buildings in the 1 per cent annual exceedance probability (AEP) floodplain.	No buildings, fences or car parks are proposed within the 1% AEP flood plain.
(18) Enable flood tolerant activities to locate in the 1 per cent annual exceedance probability (AEP) floodplain where these activities do not involve buildings or structures that exacerbate the flood hazard to other properties upstream or downstream of the site.	
(19) Require fences, storage of materials and goods and car parking in the 1 per cent annual exceedance probability (AEP) floodplains to not exacerbate the flood hazard to other properties upstream or downstream of the site.	
(20) Require earthworks within the 1 per cent annual exceedance probability (AEP) floodplain to do all of the following: (a) remedy or mitigate where practicable or contribute to remedying or mitigating flood hazards in the floodplain; (b) not exacerbate flooding experienced by other sites upstream or downstream of the works; (c) and not permanently reduce the conveyance function of the floodplain.	The Stormwater Assessment confirms that earthworks proposed within the 1% AEP floodplain will not exacerbate flooding on sites upstream or downstream of the works, and will not permanently reduce the conveyance function of the floodplain.
Floodplains – general (21) Ensure all development in the 1 per cent annual exceedance probability (AEP) floodplain does not increase adverse effects from flood hazards or increased flood depths and velocities, to other properties upstream or downstream of the site.	The proposal avoids development in the 1% AEP floodplain. Land within this floodplain will form part of the proposal's riparian margins.

(22) Required the storage and containment of hazardous substances in floodplains so that the integrity of the storage method will not be compromised in a flood event.	N/A – the storage of hazardous goods within floodplains is not proposed.
(23) Provide for flood mitigation measures which reduce flood-related effects and provide for the reconstruction of culverts and bridges where those measures do not create or exacerbate flooding upstream or downstream or otherwise increase flood hazards.	The Stormwater Assessment outlines specific flood management strategies such as detention within private wetlands and communal raingardens. The Stormwater Assessment identifies that proposed culvert reconstruction will not exacerbate downstream flooding or increase flood hazards.
(24) Enable the planting and retention of vegetation cover to enhance amenity values, green linkages and ecological values in floodplains as long as it does not create or exacerbate flooding upstream or downstream or otherwise increase flood hazards.	The proposal provides for replanting and riparian vegetation within floodplains which does not exacerbate flooding effects.
(25) When considering mitigation of flood hazards where buildings are located in floodplains, promote measures such as use of water resistant materials and flood-proof utility connections to increase resilience to flood damage.	The proposed buildings been designed to avoid being located within the 1 per cent AEP floodplain.
(26) Construct accessways, including private roads, so that flood hazard risks are not increased.	The flood modelling shows that the development will not result in any increased flooding risk. Refer to the Stormwater Assessment in Appendix 11.
(27) Enable the construction and maintenance of flood mitigation works to reduce flood risks to people, property, infrastructure and the environment.	The assessment within the Hazard Risk Assessment at Appendix 11 confirms that with the implementation of the proposed stormwater servicing, risks of adverse effects from natural (flood) hazards are not overall increased by the proposed development.
(28) Take into account any authorised earthworks or drainage infrastructure which avoids, remedies or mitigates flood hazards when assessing proposed subdivision, use or development.	
Overland flow paths	

(29) Maintain the function of overland flow paths to convey stormwater runoff safely from a site to the receiving environment. (30) Require changes to overland flow paths to retain their capacity to pass stormwater flows safely without causing damage to property or the environment.	The development has been designed to avoid the construction of buildings on land affected by floodplains or overland flow paths. The development has, where practicable, reduced risks associated with accelerating or exacerbating flooding hazard and its potential impacts and the exposure of vulnerable activities to the risk of natural hazards. The proposal maintains the conveyance function of overland flow paths. Buildings will be located outside of land affected by floodplains or overland flow paths. Overland flow paths will be conveyed within the road reserve. It is considered in the Stormwater Assessment that risk associated with the overland flow paths is low.
Land instability (31) Identify land that may be subject to land instability taking into account all of the following features: (d) proximity to cliffs; (e) steepness of land; (f) geological characteristics; (g) and uncontrolled fill. (32) Require risk assessment prior to subdivision, use and development of land subject to instability. (33) Locate and design subdivision, use and development first to avoid potential adverse effects arising from risks due to land instability hazards, and, if avoidance is not practicably able to be totally achieved, otherwise to remedy or mitigate residual risks and effects to people, property and the environment resulting from those hazards.	Land that may be subject to instability has been identified within the Geotechnical Report as **Appendix 12**. The Geotechnical Report considers provides a detailed analysis of subsurface conditions and a suite of recommendations for the following: • Earthworks; • Retaining walls; • Foundation design options for the proposed buildings and settlement monitoring; and • Methodologies during the construction phase to ensure that land and slope stability is maintained. The Geotechnical Report risk assessment notes that the site is not likely to be subject to liquefaction and lateral spreading during a ULS seismic event.
Wildfire hazards (34) Ensure that plan provisions for subdivision and vegetation management appropriately take into account wildfire hazards.	N/A – wildfire hazards are not considered relevant to this proposal

H7 Open Space Zones H7.2 Objectives – All Zones	
(1) Recreational needs are met through the provision of a range of quality open space areas that provide for both passive and active activities.	This objective is met for the reasons specified in B2.7.1(1) above.
(2) The adverse effects of use and development of open space areas on residents, communities and the environment are avoided, remedied or mitigated.	The proposed walkways within Hingaia Reserve are considered to provide recreational benefit to the future community.
H7.3 Policies - General	
(1) Design, develop, manage and maintain open spaces to: (a) provide for the needs of the wider community as well as the needs of the community in which they are located; (b) achieve the objectives for the open space zone; (c) use resources efficiently and where appropriate be adaptable and multifunctional; (d) provide for people of differing ages and abilities; (e) be safe and attractive to users; and (f) where appropriate for the zone, reflect the natural, heritage and landscape values of the area.	The Hingaia Reserve is part of a wider open space strategy designed to meet the needs of the wider Drury community. The reserve is multifunctional in that it will enable the enhancement of the Hingaia Stream while also showcasing the natural environment and providing passive recreation opportunities. The reserve is designed with safety in mind as it is located in a visually prominent areas to maximise use and passive surveillance.
(2) Develop open spaces which reflect Mana Whenua values where appropriate, including through: (a) restoring and enhancing ecosystems and indigenous biodiversity, particularly taonga species; (b) providing natural resources for customary use; and	Hingaia Reserve will reflect Mana Whenua values through the proposed riparian enhancement planting along the eastern banks of Hingaia Stream. Additionally, the reserve will provide opportunities for public art and interpretation that showcases Māori cultural heritage.

(c) providing opportunities for residents and visitors to experience Māori cultural heritage, while protecting Māori cultural heritage and sites and features of significance to Mana Whenua.	
(3) Enable the provision of infrastructure necessary to service open spaces and recreation facilities.	Walkways will be provided throughout the Hingaia Reserve so as to provide for recreation.
(4) Enable the construction operation, maintenance, repair and minor upgrading of infrastructure located on open spaces.	Stormwater infrastructure, including a new private wetland for the purposes of stormwater detention, quality and discharge will be located within the Hingaia Reserve.
H7.5.2 Objectives for Open Space – Informal Recreation Zone	
(1) The open and spacious character, amenity values and any historic, Mana Whenua, and natural values of the zone are maintained.	The natural values associated with the Hingaia Stream will be maintained and enhanced through riparian planting.
(2) Informal recreation activities are the predominant use of the zone.	The Hingaia Reserve will provide for informal recreational activities through off road pathways, seating and opportunities for public art and interpretation. This will be a passive open space encouraging appreciation and exploration of the natural environment.
(3) Buildings and exclusive-use activities are limited to maintain public use and open space for informal recreation.	Buildings and exclusive-use activities are not proposed within Hingaia Reserve.
(4) Small-scale, informal land-based water-related recreational facilities are provided for while maintaining and enhancing public access to and along the coast.	Public access to the Hingaia Stream is provided through the vesting of the esplanade reserve.
H7.5.3 Policies for Open Space – Informal Recreation Zone	
(1) Provide for a variety of informal recreation activities, including small-scale community uses and accessory activities.	This objective is met for the reasons specified in H7.5.2(2) above.

(2) Maintain or enhance the natural character values of open spaces by retaining significant vegetation (where appropriate and practical) and through weed removal, new planting and landscaping.	New riparian planting is proposed within the Hingaia Reserve as set out in the Landscape Design Report in Appendix 7.
(3) Require development, including new buildings and structures, located near scheduled Sites or Places of Significance to Mana Whenua to recognise the relationship of Mana Whenua to the area.	N/A – not relevant to proposal
(4) Limit buildings, structures and activities to those necessary to enhance people's ability to use and enjoy the open space for informal recreation.	No buildings or structures are proposed within Hingaia Reserve.
(5) Locate and design buildings and structures to: (a) complement the open and spacious character, function and amenity values of the zone; (b) maintain public accessibility and minimise areas for exclusive use; and (c) protect any natural or historic heritage values.	
(6) Use the street network and internal roads for parking in preference to on-site parking, and where it is necessary to provide on-site vehicle access and parking, ensure the character of the zone is maintained.	Onsite carparking and vehicle access is not proposed within Hingaia Reserve.
(7) Manage the intensity of activities to minimise adverse effects such as noise, glare and traffic on the amenity values of the surrounding area.	This policy is met for the reasons set out in H7.2(2).
(8) Limit activities and their associated facilities adjoining the coast or water bodies to those that have a functional or operational need for a coastal location.	Activities next to Hingaia Stream are limited to riparian planting and paths which enhance public access to the stream.

(9) Avoid use and development in locations adjoining the coast or water bodies where they will have more than minor adverse effects on any of the following: (a) public access; (b) the visual amenity values of the coast and water bodies; (c) areas of high natural or historic heritage value; or (d) Mana Whenua values.	The proposal maintains and enhances public access to watercourses and waterbodies through the paths proposed within Hingaia Reserve.

Business – Metropolitan Centre Zone H9.2 Objectives	
(1) A strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, and provide employment, housing and goods and services, all at a variety of scales.	The proposal will deliver Drury Centre which will provide for a variety of commercial, employment, community and open spaces. The Centre will provide an attractive Centre for not only the 'Drury Centre' development area, but the Drury East and Waihoehoe development areas. Through delivery of the Drury Centre, the project will enable a key focal point enabling employment, retail and amenity for the wider south Auckland area.
(2) Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.	The proposed Stage 2 development is for the Drury Centre and will be provided within a block structure and urban grain as anticipated within the Metropolitan Centre Zone. So as to provide for an efficient Centre which will serve as the focal point for the wider Drury development area, buildings are provided at a greater intensity. As seen in the Architectural Drawings, development will be comprehensively landscaped and designed.
(3) Development positively contributes towards planned future form and quality, creating a sense of place.	The proposal positively contributes towards the planned future form of Drury Centre consistent with the Drury Centre Precinct and masterplan. The landscaping strategy seeks to create a connected, green and engaging public domain that appropriately responds to the site and context. In particular, the green network within the Drury Stage 2 development creates a cohesive system that supports recreational activity, sustainability, and environmental connectivity. Anchored by the stormwater wetland (Wetland 2-1) and Stream A, the design enhances water quality while promoting biodiversity and habitat restoration. The network extends to the Hingaia Reserve, forming an interconnected green corridor that links key civic plaza spaces within the

	Precinct. The design considers passive and active recreation opportunities while addressing environmental resilience, ecological health and sustainability objectives.
(4) Business activity is distributed in locations, and is of a scale and form, that: (a) provides for the community's social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.	The proposal will provide for a variety of commercial and retail uses which will assist in the provision for not only the subject site's social and economic needs but the wider Drury development area. Stage 2 of the Drury Centre will provide for community uses and open spaces and which will improve opportunities for social interaction. Effects on the environment with regard to infrastructure and residential amenity have been assessed within the AEE as Sections 10.9 and 10.7 respectively.
(5) A network of centres that provides: (a) a framework and context to the functioning of the urban area and its transport network, recognising: (i) the regional role and function of the city centre, metropolitan centres and town centres as commercial, cultural and social focal points for the region, sub-regions and local areas; and (ii) local centres and neighbourhood centres in their role to provide for a range of convenience activities to support and serve as focal points for their local communities. (b) a clear framework within which public and private investment can be prioritised and made; and	This objective is met for the reasons set out in H9.2(1) and H9.2(2).

(c) a basis for regeneration and intensification initiatives.	
(6) Metropolitan centres are reinforced and developed for commercial, community and civic activities and provide for residential intensification.	The project will deliver part of the first stage of Drury Centre, and Stage 2. Once completed, Drury Centre is projected to deliver approximately 400 new dwellings and directly promote Drury and the wider Auckland south's economy by providing more employment opportunities. This stage of the project will provide development amounting to approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms.
(7) Metropolitan centres are an attractive place to live, work and visit with vibrant and vital commercial, entertainment and retail areas.	This policy is met for the reasons set out in H9.2(3).
(8) Key Retail Frontage streets are a focus for pedestrian activity, with identified General Commercial Frontage streets supporting this role.	N/A the proposal is not subject to the Key Retail Frontage.
H9.3 Policies	
(1) Reinforce the function of the city centre, metropolitan centres and town centres as the primary location for commercial activity, according to their role in the hierarchy of centres.	The proposal includes the approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms within the Metropolitan Centre Zone.
(2) Enable an increase in the density, diversity and quality of housing in the centre zones and Business – Mixed Use Zone while managing any reverse sensitivity effects including from the higher levels of ambient noise and reduced privacy that may result from non-residential activities.	Residential development is proposed at an appropriate density within the Drury Centre. Within the Stage 2 area, residential development is predominately located within the north-eastern portion of site. Valley Park and the promenade will also provide a buffer/transition between the commercial activities and the residential activities located to the north east of the site, reducing common effects associated with commercial operations (e.g. light spill, noise) and are considered to be separated by generous open space area from any activities which might have the potential to generate adverse reverse sensitivity effects.

(3) Require development to be of a quality and design that positively contributes to: (a) planning and design outcomes identified in this Plan for the relevant zone; (b) the visual quality and interest of streets and other public open spaces; and (c) pedestrian amenity, movement, safety and convenience for people of all ages and abilities.	The development will provide a pedestrian-focused circulation network of streets and pedestrian connections. The proposed layout provides a logical hierarchy of vehicular and cycle connections. The streets are designed to provide a comfortable pedestrian environment through footpaths, boulevards, tree planting, lighting and soft landscaping. A shared path connection will be provided within Hingaia Reserve.
(4) Encourage universal access for all development, particularly medium to large scale development.	All buildings are accessible directly from the ground floor and universal access will be provided.
(5) Require large-scale development to be of a design quality that is commensurate with the prominence and visual effects of the development.	This policy is met for the reasons set out in H9.2(2).
(6) Encourage buildings at the ground floor to be adaptable to a range of uses to allow activities to change over time.	A variety of floor areas and uses are proposed at ground floors to allow for an adaptable range of uses as required in the future.
(7) Require at grade parking to be located and designed in such a manner as to avoid or mitigate adverse effects on pedestrian amenity and the streetscape.	The proposed carparking will be largely located within the middle of the blocks so that it is largely screened and sleeved from the streetscape by buildings. Where at grade carparks or carparking buildings are located next the street these are proposed to be softened by landscaping or architectural features on the buildings.
(8) Require development adjacent to residential zones and the Special Purpose School Zone and Special Purpose – Māori Purpose Zone to maintain the amenity values of those areas, having specific regard to dominance, overlooking and shadowing.	Development adjacent to the THAB zoning to the east will be separated by Fitzgerald Road. Under this proposal, the residential lots to be subdivided as part of the Stage 1 Drury Centre are not considered to generate any adverse effects on properties zoned THAB to the east.

(9) Discourage activities, which have noxious, offensive, or undesirable qualities from locating within the centres and mixed use zones, while recognising the need to retain employment opportunities.	N/A – no noxious, offensive or undesirable activities proposed.
(10) Discourage dwellings at ground floor in centre zones and enable dwellings above ground floor in centre zones.	It is noted that proposed residential dwellings will be predominately located to the north-east within the Stage 2 Drury Centre area. No residential dwellings are proposed at ground floors.
(11) Require development to avoid, remedy or mitigate adverse wind and glare effects on public open spaces, including streets, and shading effects on open space zoned land.	The proposed building facades feature a high degree of articulation so as that large areas of glazing will be broken up. Landscape within streets and open space areas will include vegetation of various sizes, reducing potential wind effects. Given the size of the buildings and their distance from the Hingaia Reserve, the proposal is not anticipated to generate any adverse shading effects on the open space zoned land.
(12) Recognise the functional and operational requirements of activities and development.	The proposed development is comprehensively designed, such that it will respond to both the internal and external site context, and allow for activities as anticipated by the underlying zoning and the centre's role within the wider Drury development area.
(13) In identified locations within the centres zones, Business – Mixed Use Zone, Business – General Business Zone and Business – Business Park Zone enable greater building height than the standard zone height, having regard to whether the greater height: (a) is an efficient use of land; (b) supports public transport, community infrastructure and contributes to centre vitality and vibrancy; (c) considering the size and depth of the area, can be accommodated without significant adverse effects on adjacent residential zones; and	N/A – height variation control does not apply.

(d) is supported by the status of the centre in the centres hierarchy, or is adjacent to such a centre.	
(14) In identified locations within the centre zones, Business – Mixed Use Zone, Business – General Business Zone and Business – Business Park Zone, reduce building height below the standard zone height, where the standard zone height would have significant adverse effects on identified special character, identified landscape features, or amenity.	N/A – not relevant to proposal.
(15) Enable significant growth and intensification in metropolitan centres.	This policy is met for the reasons set out in H9.2(3).
(16) Manage development in metropolitan centres so that it contributes to the function and amenity of the centre.	This policy is met for the reasons set out in H9.2(3).
(17) Encourage a wide range, and a high concentration, of commercial, leisure, tourist, cultural and community activities and civic services in metropolitan centres.	The project includes approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms. In addition, 292 vacant residential lots are also proposed within the original 13 residential superlots previously consented as part of Stage 1.
(18) Require those parts of buildings with frontages subject to the Key Retail Frontage Control to maximise street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality.	N/A – not relevant to proposal.
(19) Require those parts of buildings with frontages subject to the General Commercial Frontage Control to achieve a reasonable level of street activation, building	N/A – not relevant to proposal.

continuity along the frontage, pedestrian amenity and safety and visual quality.	
(20) Encourage developments to support a range of transport modes serving metropolitan centres and the ability to change transport modes.	The development incorporates an integrated network of streets that cater for cars, pedestrians and cyclists and which will connect through eventually to the Drury Central Rail Station.
(21) Encourage the location of supermarkets and department stores within metropolitan centres by recognising: (a) the positive contribution these activities make to centre viability and function; (b) the functional and operational requirements of these activities; and (c) where preferred built form outcomes are not achieved, the development needs to achieve a quality built environment by positively contributing to public open space, including the activation of streets.	Large format retail will include department stores so as to provide for the requirements of the wider Drury development area.
(22) Require activities adjacent to residential zones to avoid, remedy or mitigate adverse effects on amenity values of those areas.	The location of the Town Square, Valley Park and the promenade will provide a buffer/transition between the commercial activities and the residential activities located to the north east of the site, reducing common effects associated with commercial operations (e.g. light spill, noise).
(23) Restrict maximum impervious area within a riparian yard in order to ensure that adverse effects on water quality, water quantity and amenity values are avoided or mitigated.	N/A – no impervious areas are proposed in the riparian yards.
H13 Business Mixed-Use Zone H13.2 Objectives	

(6) Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the public transport network.	Proposed residential lots within the Stage 1 fall within the Mixed-Use Zone ('MUZ'). Within the context of the development standards of the MUZ as they would apply to these lots, the general size and shape of the lots proposed ensures there will be sufficient flexibility to deliver a range of quality building types and activities consistent with the expectations of the AUP (OP).
(7) Activities within the zone do not compromise the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Local Centre Zone.	The residential lots within the Stage 1 area and LFR ('Lot C') within the Stage 2 area zoned MUZ will form part of a comprehensively planned development and are not considered to compromise the function, role and amenity of the Metropolitan Centre Zone.
(8) A mix of compatible residential and non-residential activities is encouraged.	
(9) Business – Mixed Use Zone zoned areas have a high level of amenity.	The residential lots within the Stage 1 area are designed and arranged to support good levels of on-site amenity and solar orientation, while also providing appropriate access to support walking and cycling. The LFR ('Lot C') within the Stage 2 area zoned MUZ will be provided with accessible connections to the roading network and landscape buffers between the streets and carparks, to create an attractive street frontage. The entranceway is a key feature within the façade, highlighted through modulation and material changes within the built form.
H13.3 Policies	
(15) In areas surrounding the city centre, recognising their proximity and accessibility to the Business – City Centre Zone and Business – Metropolitan Centre Zone at Newmarket, provide opportunities for substantial office activities in the Business – Local Centre Zone and Business – Mixed Use Zone.	N/A – not relevant to proposal

(16) Locate the Business – Mixed Use Zone in suitable locations within a close walk of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone or the public transport network.	N/A - This policy relates to the location of the Mixed Use Zone which was considered through PC48. It is noted that the proposed development and subdivision within the MUZ will be provided with walkable connections to the Metropolitan Centre Zone ('MCZ').
(17) Provide for a range of commercial activities that will not compromise the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Local Centre Zone, beyond those effects ordinarily associated with trade effects on trade competitors.	The project includes the establishment of LFR within the MUZ. This will form part of the comprehensively planned Stage 2 area, and as such is not considered to compromise the role of the Metropolitan Centre Zone.
(18) Enable the development of intensive residential activities.	The project includes 292 vacant residential lots within the MUZ, proposed within the original 13 residential superlots previously consented as part of Stage 1. Within the context of the development standards of the MUZ as they would apply to these lots, the general size and shape of the lots proposed ensures there will be sufficient flexibility to deliver a range of quality building types and activities consistent with the expectations of the AUP (OP).
(19) Require those parts of buildings with frontages subject to the General Commercial Frontage Control to achieve a reasonable level of street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality.	N/A – not relevant to proposal
(20) Promote and manage development to a standard that: (a) recognises the moderate scale, intensity and diversity of business, social and cultural activities provided in the zone; (b) recognises the increases in residential densities provided in the zone; and (c) avoids significant adverse effects on residents.	The project includes the establishment of LFR and 292 residential lots within the MUZ. As part of a master-planned development, these buildings and land uses are considered to be appropriate in the context of the Drury Centre Precinct development and the underlying zone. Within the context of the development standards of the MUZ as they would apply to the residential Stage 1 lots, the general size and shape of the lots proposed ensures there will be sufficient flexibility to deliver a range of quality building types and activities consistent with the expectations of the AUP (OP). In general, the lots are designed and arranged to support good

	levels of on-site amenity and solar orientation, while also providing appropriate access to support walking and cycling.
(21) Require activities adjacent to residential zones to avoid, remedy or mitigate adverse effects on amenity values of those areas.	Development adjacent to the THAB zoning to the east will be separated by Fitzgerald Road. Under this proposal, the 292 residential lots to be subdivided as part of the Stage 1 Drury Centre are not considered to generate any adverse effects on properties zoned THAB to the east.
(22) Restrict maximum impervious area within a riparian yard in order to ensure that adverse effects on water quality, water quantity and amenity values are avoided or mitigated.	N/A – not relevant to MUZ land within the proposal
I450 Drury Centre Precinct I450.2 Objectives	
(1) Drury Centre is a vibrant and intensive transit-orientated development, that supports employment-generating and retail activities and high density residential within walking distance of rapid transit, and which prioritises public and active modes of transport to and within the centre.	The proposal will deliver Stage 2 of Drury Centre, an integrated, sustainable and transit oriented metropolitan centre to be established around the fully funded and consented Drury Central Rail Station. Major anchor retail tenants are proposed sleeved by smaller retail units closer to Stage 1 development with commercial, community and other smaller and more fine grain retail activities and higher density residential to be located to the north, closer to the train station.
(2) Drury Centre provides for the social and economic needs of the wider Drury-Opaheke community, and is the primary location for retail, civic, recreation and intensive employment activities, creating a focal point for the area.	Approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms across 10 lots (A-H, J and K) is proposed.
(3) Development of the Drury Centre creates a distinctive sense of place, which responds to natural and built site features, landform and Mana Whenua values.	The proposed Dury Centre Stage 2 will provide for a street network and block structure that will appropriately connect to the future Drury Central Rail Station and the wider transport network, and prioritise active and public transport modes. It will include a mix of land uses, open spaces and public amenities to create a focal point for activity at the centre of the wider Drury

	development. This will assist in supporting a vibrant and active centre environment. Proposed buildings will positively address and engage with the street. The road and subdivision layout has taken into account distinctive site features, such as Hingaia Stream. The retention of such spaces and incorporation of these into the overall design layout and scheme ensures that these contribute to a sense of place and a quality network of open spaces for the precinct.
(4) Drury Centre is a walkable centre, with a street-based environment that positively contributes to pedestrian amenity, safety and convenience, with a particular emphasis on the Key Retail Street and key collector roads.	The proposal is considered to have an attractive and walkable street environment which is designed to positively contribute to pedestrian amenity and safety, with a particular focus on Hotiki Street as the key retail street.
(5) Subdivision and development does not occur in advance of the availability of operational transport infrastructure, including regional and local transport infrastructure.	As detailed in the ITA and in the AEE provided with the application, local transport infrastructure required for the Project will either be provided by Kiwi or jointly with the Drury developers to the extent that subdivision and development will be contemporaneous with infrastructure provision. Consent conditions have been proposed to ensure these infrastructure upgrades are constructed and operational prior to occupation/use of land or release of 224c as it relates to the residential vacant lot subdivision.
(6) Access to and from the precinct occurs in an effective, efficient and safe manner that mitigates adverse effects of traffic generation on the surrounding road network.	As assessed in the ITA, safe access to the precinct will be provided. The associated internal roading network will accommodate the proposed level of anticipated use and ensure that any adverse effects of traffic generation on the safety and effectiveness of the internal road network are appropriately managed. The surrounding road network is being upgraded as part of separate resource consents. The ITA demonstrates that the internal road network will be able to operate with reasonable efficiency during peak periods.
(7) Drury Centre develops and functions in a way that: (a) Results in a mode shift to public and active modes of transport; and (b) Provides safe and effective movement between, retail areas, community facilities, housing, jobs,	The proposal is considered to meet this objective as the proposed roading and subdivision layout has been designed to favour pedestrians and cyclists and future public transport to support the desired mode shift. The proposed roading layout will facilitate safe and efficient movement via active modes within the precinct and to the Drury Central Rail Station.

open spaces and the Drury Central train station by active modes.	
(8) Development is coordinated with the supply of sufficient water, energy and communications infrastructure.	The proposed development will be coordinated with the delivery of sufficient transport, water, energy and communications infrastructure as outlined in the ITA and Infrastructure Report.
(9) Freshwater, sediment quality, and biodiversity are improved.	The proposal will result in freshwater, sediment quality and biodiversity over time for the reasons set out under E1 Water quality and integrated management, E11 Land disturbance – Regional and E15 Vegetation management and biodiversity above.
(10) Activities sensitive to noise adjacent to the railway corridor are designed to protect people's health and residential amenity while they are indoors, and in a way that does not unduly constrain the operation of the railway corridor.	N/A – no activities sensitive to noise adjacent to the railway corridor are proposed as part of this application.
I450.3 Policies	
(1) Provide for the greatest density of retail and commercial activities with supporting community and residential activities within Sub-Precinct A and discourage activities which do not support an active and lively retail street frontage with a fine grained, pedestrian orientated outcome.	A higher intensity of residential and retail will be provided for within the Drury Town Centre, which is within close proximity to the public transport network including the Drury Central Rail Station, and a variety of commercial, retail, community activities and open space. Approximately 106,00m² of commercial, retail, food and beverage, entertainment and community activities as well as 102 residential units and 282 hotel rooms are proposed within Sub-Precinct A (Drury Centre). The proposed retail and commercial activities are considered to be provided at a greater density relative to surrounding Drury Centre Sub-Precincts. The Urban Design Assessment as **Appendix 14** considers that the proposal will have an attractive street environment which is designed to positively contribute to pedestrian amenity, safety and safety, with a particular focus on Hotiki Street as the key retail street.
(2) Recognise that Sub-Precinct B will be the primary location for large format retail activities.	N/A – Sub-Precinct B not relevant to proposal.

(3) Provide for high density residential and supporting intensive employment activities compatible with residential amenity values in Sub-Precinct C, D and E that supports the function, role and amenity of Sub-Precinct A as the core centre.	The project is largely for the development of retail, commercial, community activities and higher density residential with sub-precinct A which will form the core centre. A large format retail lot is provided with sub-precinct C with the further subdivision of approved superlots in sub-precinct D into 292 vacant lots for residential development.
(4) Provide for a greater range of intensive employment activities in Sub-Precinct E responding to its close proximity to rapid transport, while supporting the function, role and amenity of Sub-Precinct A as the core centre.	N/A – Sub-Precinct E not relevant to proposal.
(5) Require attractively designed, safe and direct access to the Drury Central train station, with a particular focus on pedestrians and cyclists.	The development incorporates an integrated network of streets that cater for cars, pedestrians and cyclists which will eventually connect to the Drury Central Rail Station via the Main Street South.
(6) Require collector roads to be provided generally in the locations shown in I450.10.2 Drury Centre: Precinct Plan 2, while allowing for variation, where it would achieve a better connected street layout that integrates with the surrounding and proposed transport network.	It is considered that the proposed collector roads are located within the general locations identified on the Precinct Plan 2.
(7) Ensure that development provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, and the surrounding transport network, and supports the safety and amenity of the open space and stream network	As a master-planned development, the proposed local road network achieves a well-connected and attractive street layout. It integrates with the proposed collector roads and will support connectivity to the surrounding network through the provision of future connection opportunities. The roads are designed to support pedestrian activity and safety and amenity to adjoining open spaces and active frontages.

(8) Require the transport network to be attractively designed to appropriately provide for all modes of transport in accordance with Appendix 1, including by: (a) providing a high standard of amenity for pedestrians in areas where high volumes of pedestrians are expected; (b) providing for safe separated access for cyclists on arterial and collector roads that link key destinations; (c) providing a level of landscaping that is appropriate for the function of the street; and (d) providing for the safe and efficient movement of vehicles.	The proposed street network and block structure will prioritise active and public transport modes. The Urban Design Assessment considers that the proposal will provide an attractive street environment which is designed to positively contribute to pedestrian amenity and safety. The ITA considers that the proposed roading infrastructure provides a well-connected and integrated active mode network with provision for uni-directional cycle lanes and footpaths on all collector roads, and footpaths on both sides of all local roads. The road network will provide for the safe and efficient movement of vehicles.
(9) Manage building height and form to: (a) Maximise heights and densities close to the Drury Central train station and the frequent transport network; (b) Contribute positively to Drury's sense of place, including by: (i) Reinforcing the function of Sub-precinct A as the core of Drury Centre; (ii) Responding to landform; and (iii) (Transitioning the scale of built form to visually integrate with adjoining areas. (c) Minimise shading effects on large publicly accessible open spaces.	Fine-grain retail, commercial and residential uses are proposed at heights and densities that are considered to support the function of the Drury Centre and Drury Central Rail Station. The proposed layout is considerate of the existing landform, with Valley Park proposed to incorporate the riparian margins of Stream A. Valley Park will act as a focal point for activity within the centre of the site. Its integration with the Town Square and Stream A will assist in creating a well-connected movement network as well as provide for activity and a high-level of amenity. Hingaia Reserve will be retained as an open space area, with recreational walkways within the Reserve proposed. The proposed buildings will comply with the maximum building height and therefore any shading effects on the Hingaia Reserve and other open spaces are considered to be acceptable.

(10) Ensure that Sub-Precinct A is designed to be the compact, pedestrian orientated retail core of the precinct with a fine-grained network of streets that are open to the sky.	The configuration of the blocks and street network has been designed to respond to the identified constraints and opportunities of the site, and the key structuring elements identified in Precinct Plan 2 of the Drury Centre Precinct. A series of 16m wide streets stem from the 'collector roads' and the 'key retail street,' to form the proposed Blocks in a gridded formation. Combined with the location and configuration of Valley Park, the street network serves to funnel future pedestrians towards the Drury Central Rail Station. Proposed blocks are broken down into a series of pedestrian accessways, plazas and landscaped areas, providing accessibility and connectivity across the proposal to support a walkable pedestrian network.
(11) Ensure that development positively addresses and engage with the street by: (a) Maximising street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality on the Key Retail Street. (b) Achieving a reasonable level of street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality on other local roads in Sub-Precinct A, and the General Commercial frontages shown on Precinct Plan 2A.	Fine grain retail and commercial activities are proposed within Lots A, B, D, and E, and have been strategically located to create a strong edge and frame Hotiki Road. The fine grain retail is oriented to face Hotiki Road with legible and accessible entryways at ground floor.
(12) Recognise that appropriately designed residential at ground floor may locate on some local roads in Sub-Precinct A away from the Key Retail Street, including where residential adjoins public open space.	Residential at ground floor will locate at ground floor in select areas within the north-eastern portion of the Stage 2 area of Sub-Precinct A. The dwellings are located within close proximity to Valley Park and are considered to be appropriately separated from the Key Retail Street (Hotiki Road).
(13) Require large format retail activities in Sub-Precinct B to provide for the visual quality and interest of streets and other public places, having regard to the functional requirements of that activity.	N/A – no LFR within Sub-Precinct B proposed as part of this application.
(14) Enable residential activities at high densities in Sub-Precinct C, D and E that provide quality on-site amenity	The proposed 292 residential lots within Sub-Precinct D are considered to be generally designed and arranged to support good levels of on-site amenity and solar orientation, while also providing appropriate access to support walking and cycling.

for residents, including privacy and outlook, outdoor living space and access to daylight.	
(15) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place for the Drury Centre and a quality network of open spaces in Drury-Opāheke, including by: (a) incorporating distinctive site features, including the existing Homestead; (b) reinforcing legibility within the centre; and (c) integrating with the stream network to create a green corridor following the Hingaia and Fitzgerald streams.	Homestead Park is no longer proposed as part of the development as envisioned in the original masterplan and Drury Centre Precinct provisions. In lieu of Homestead Park, Valley Park has been significantly expanded to provide a focal point for the civic and public activity at the centre of the proposal. The more extensive design of Valley Park is also a response to the stormwater/ecological requirements needed to enhance Stream A. This aligns with the Drury Centre precinct which seeks to maintain and enhance the waterways on site, integrating them with the open space network as a key feature.
(16) Promote a mode shift to public transport and active modes by: (a) Requiring active mode connections to the Drury Central train station for all stages of development; (b) Requiring streets to be designed to provide safe separated access for cyclists on collector and arterial roads; (c) Limiting the supply of on-site parking for office activities to minimise the growth of private vehicle trips by commuters travelling during peak periods; (d) Requiring end-of-trip facilities for all commercial and community activities; (e) Encouraging office and retail activities to implement additional travel demand	The proposal is considered to meet these policies as the proposed roading and subdivision layout has been designed to favour pedestrians and cyclists and future public transport to support the desired mode shift. The proposed roading layout will facilitate safe and efficient movement via active modes within the precinct and will eventually connect to the Drury Central Rail Station. The ITA considers that the proposed roading infrastructure provides a well-connected and integrated active mode network with provision for uni-directional cycle lanes and footpaths on all collector roads, and footpaths on both sides of all local roads. The road network will provide for the safe and efficient movement of vehicles. As outlined in the ITA, on-site parking for office activities and appropriate end-of-trip facilities will be provided in accordance with the AUP (OP) requirements.

management measures that would promote the use of public transport.	Activities and their usage have been carefully considered to ensure those uses associated with greater public transport usage (commercial office and residential) are positioned closer to the Drury Central Rail Station.
(17) Encourage office and retail activities to implement additional travel demand management measures that would promote the use of public transport	
(18) Ensure that the adverse effects of traffic generation on the surrounding transport network, including by ensuring: (a) Public transport can operate efficiently at all times; (b) The surrounding road network can operate with reasonable efficiency during inter-peak periods; (c) Safe and efficient movement of freight vehicles within and through the Drury South precinct; (d) Any upgrades to the transport network are safe for pedestrians, cyclists and motorists.	As assessed in the ITA, safe access to the precinct will be provided. The associated internal roading network will accommodate the proposed level of anticipated use and ensure that any adverse effects of traffic generation on the safety and effectiveness of the internal road network are appropriately managed. The surrounding road network is being upgraded as part of separate resource consents. The ITA demonstrates that the internal road network will be able to operate with reasonable efficiency during peak periods.
(19) Provide for the progressive upgrade of existing roads and key intersections within and adjoining the Drury Centre precinct, including the upgrade of road frontages to an urban standard at the time of development or subdivision of adjoining land to provide for all modes and connect with the existing transport network to the Drury Central train station.	The surrounding road network will be upgraded as part of separate resource consents. The proposal will provide for both the internal Drury Centre network and a future road connection (Station Road on Precinct Plan 2) into adjoining sites to the east for ease of future development ensuring the proposal contributes to the connectivity within the wider Drury development area.
(20) Require that subdivision and development does not occur in advance of the availability of operational	

transport infrastructure, including regional and local transport infrastructure.	Subdivision and development in this project will be contemporaneous with the provision of necessary infrastructure as outlined in the ITA and Infrastructure Report, and conditions of consent have been proposed to ensure this.
(21) Ensure that development in Drury Centre Precinct is coordinated with sufficient stormwater, wastewater, water, energy and communications infrastructure.	
(22) Require subdivision and development, as it proceeds, to provide access to permanent safe, direct and legible pedestrian and cycling connections to the Drury Central train station and schools within the Precinct Plan 3 area.	The proposed roading layout will facilitate safe and efficient movement via active modes within the precinct and to the Drury Central Rail Station.
(23) In addition to the matters in Policy E1.3(8), manage erosion and associated effects on stream health and values arising from development in the precinct, including parts of the Fitzgerald and Hingaia streams, and enable in-stream works to mitigate any effects.	The project requires the reclamation of Stream A wetland and the two eastern tributaries of Stream A to construct Drury Boulevard. The realigned and daylighted portions of Stream A and Hingaia Stream will provide planting on the riparian margins which will contribute to the improvement to water quality, habitat and biodiversity.
(24) In addition to the matters in Policy E.3.3(13), provide for stream works, including reclamation, where they are required to construct Drury Boulevard.	
(25) Contribute to improvements to water quality, habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams.	
(26) Require subdivision and development to be consistent with any approved network discharge consent and the	As established in the Stormwater Assessment, the development has been designed to be consistent with the Drury East SMP and Auckland Council NDC to manage flooding effects and to adopt the treatment train approach. The Infrastructure Report notes that stormwater management strategy adopts a comprehensive approach that includes flood management,

treatment train approach outlined in the supporting stormwater management plan, including: (a) Application of water sensitive design to achieve water quality and hydrology mitigation; (b) Requiring the use of inert building materials to eliminate or minimise the generation and discharge of contaminants; (c) Requiring treatment of runoff from public road carriageways and publicly accessible carparks at or near source by a water quality device designed in accordance with GD01; (d) Requiring runoff from other trafficked impervious surfaces to treat contaminant generating surfaces, including cumulative effects of lower contaminant generating surfaces; (e) Providing planting on the riparian margins of permanent or intermittent streams; (f) Ensuring development is coordinated with sufficient stormwater infrastructure.	hydrological mitigation, and water quality treatment. All impervious surfaces within the development will meet SMAF 1 hydrological mitigation requirements. The design prioritizes the use of communal treatment devices where practical, incorporating raingardens and bioretention systems for both public roads and private areas.
(27) Ensure development manages flooding effects upstream and downstream of the site and in the Drury Centre precinct so that the risks to people and property (including infrastructure) are not increased for all flood events, up to a 1% AEP flood event. This may include appropriately designed and sited interim storage/attenuation areas prior to culvert upgrades.	The flood modelling shows that the development will not result in any increased flooding risk. Refer to the Stormwater Assessment in Appendix 11.
(28) Ensure that "Activities sensitive to noise" adjacent to the railway corridor are designed with acoustic	N/A – no activities sensitive to noise are located adjacent to the railway corridor as part of this proposal.

attenuation measures to protect people's health and residential amenity while they are indoors and that such activities do not unduly constrain the operation of the railway corridor.	
(29) Development responds to Mana Whenua values by: (a) Delivering a green corridor following the Hingaia and Fitzgerald streams; (b) Taking an integrated approach to stormwater management; (c) Ensuring the design of streets and publicly accessible open spaces incorporate Te Aranga design principles; (d) Encouraging engagement with Mana Whenua to inform the design of development in Drury Centre.	The development meets this policy and responds to Mana Whenua values as it delivers a green corridor following the Hingaia and Stream A which follows the natural stream network within the site/precinct. The proposal takes an integrated approach to stormwater management. Te Aranga design principles have been taken into account in the design of streets and publicly open spaces, which is demonstrated in the Landscape Plans as Appendix 7. Mana whenua engagement has been undertaken and has informed design responses, refer to Appendix 22.
E38 Subdivision – Urban E38.2 Objectives	
(1) Land is subdivided to achieve the objectives of the residential zones, business zones, open space zones, special purpose zones, coastal zones, relevant overlays and Auckland-wide provisions.	The site will be subdivided to achieve the purpose of the Metropolitan Centre and Mixed-Use zones, which are assessed below, and the Auckland-wide provisions above, which are not repeated here.
(2) Land is subdivided in a manner that provides for the long-term needs of the community and minimises adverse effects of future development on the environment.	The proposal will provide for the long-term needs of the community through the provision of a transit-oriented centre in Stage 2 and residential lots in Stage 1 that will provide for future development in accordance with the precinct and underlying zoning provisions. The assessment at Section 10.7 of the AEE demonstrates that the development appropriately minimises adverse effects of development on the environment.

(3) Land is vested to provide for esplanades reserves, roads, stormwater, infrastructure and other purposes.	This objective is met as land will be vested for roads and infrastructure.
(4) Infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner and provided for to be in place at the time of the subdivision or development.	The proposal meets this objective as the infrastructure required to support the subdivision (and associated development) will be in place at the time of subdivision/development. Refer to the Infrastructure Report.
(5) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.	Proposed subdivision and development will upgrade existing networks where necessary or provide for new networks, and as such, is not considered to have adverse incompatibility or reverse sensitivity effects
(6) Subdivision has a layout which is safe, efficient, convenient and accessible.	The subdivision layout is considered to be safe, efficient and accessible with a legible roading and block pattern.
(7) Subdivision manages adverse effects on historic heritage or Maori cultural heritage.	Works will avoid the identified archaeological site.
(8) Subdivision maintains or enhances the natural features and landscapes that contribute to the character and amenity values of the areas.	The subdivision layout has been designed to maintain natural features where practicable, including existing watercourses and wetlands. Where practicable the subdivision will maintain and enhance existing streams by avoiding development in these areas. Riparian planting will be carried out along the streams thereby enhancing the character and amenity values of the area.
(9) Subdivision to protect indigenous vegetation or wetlands is provided for in the residential zones.	Subdivision will protect streams and riparian margins via conditions requiring that these are protected in perpetuity.
(10) Subdivision: (a) within urban and serviced areas, does not increase the risks of adverse effects to people,	As noted in B10 above, all hazards will be mitigated or avoided as part of the land use consent works.

property, infrastructure and the environment from natural hazards; (b) avoids, where possible, and otherwise mitigates, adverse effects associated with subdivision for infrastructure or existing urban land uses; and (c) maintains the function of flood plains and overland flow paths to safely convey flood waters, while taking into account the likely long term effects of climate change.	
E38.3 Policies	
(1) Provide for subdivision which supports the policies of the Plan for residential zones, business zones, open space zones, special purpose zones, coastal zones, relevant overlays and Auckland-wide provisions.	The site will be subdivided to achieve the purpose of the Metropolitan Centre and Mixed Use zones, which are assessed below, and the Auckland-wide provisions above, which are not repeated here.
(2) Require subdivision to manage the risk of adverse effects resulting from natural hazards in accordance with the objectives and policies in E36 Natural hazards and flooding, and to provide safe and stable building platforms and vehicle access.	The proposed subdivision meets this policy as the risk of adverse effects arising from natural flooding hazards are managed through the overall layout and design of development and open space across the site. The development provides safe and stable building platforms and vehicle access. The objectives and policies of E36 have been assessed above.
(3) Require subdivision design to respond to the natural landscapes by: (a) avoiding building platforms and, where practicable, infrastructure, on identified or dominant ridgelines on sites zoned Residential – Large Lot Zone or Residential – Rural and Coastal Settlement Zone;	The subdivision layout has been designed to respond to the physical characteristics of the site, including providing for a development layout and road network that complements the natural contouring, watercourses, vegetation and open space.

(b) locating and designing roads, access and infrastructure in a manner which minimises earthworks; and (c) locating roads and development to follow land contours.	
(4) Require subdivision to be designed to retain, protect or enhance scheduled features including those in the Historic Heritage Overlay and Sites and Places of Significance to Mana Whenua Overlay.	N/A – site is not subject to Historic Heritage Places Overlay or Sites and Places of Significance to Mana Whenua Overlay
(5) Provide for subdivision of residential zoned sites containing indigenous vegetation scheduled in the D9 Significant Ecological Areas Overlay where the significant ecological area is to be protected, and enable the same or a similar number of sites to be created as would be enabled if the site did not contain a significant ecological area.	N/A – site is not subject to SEA.
(6) Provide for subdivision around existing development, and where it enables creation of sites for uses that are in accordance with an approved land use resource consent and where there is compliance with Auckland-wide and zone rules.	Subdivision will be in accordance with an approved land use consent.
(7) Provide for minor boundary adjustments which enable a more efficient and effective use of land where there is compliance with Auckland-wide and zone rules.	N/A – minor boundary adjustment not proposed
(8) Avoid subdivision of minor dwellings or converted dwellings not complying with minimum lot size.	N/A – not proposed

(9) Require any staged subdivision to be undertaken in a manner that promotes efficient development.	Subdivision and development will be undertaken stages to promote efficient development. Conditions of consent relating to provision of infrastructure prior to release of titles under 224(c) are proposed.
(10) Require subdivision to provide street and block patterns that support the concepts of a liveable, walkable and connected neighbourhood including: (a) a road network that achieves all of the following: (i) is easy and safe to use for pedestrians and cyclists; (ii) is connected with a variety of routes within the immediate neighbourhood and between adjacent land areas; and (iii) is connected to public transport, shops, schools, employment, open spaces and other amenities; and (b) vehicle crossings and associated access designed and located to provide for safe and efficient movement to and from sites and minimising potential conflict between vehicles, pedestrians, and cyclists on the adjacent road network.	As noted in the ITA, the design of the road network will avoid adverse effects on the streetscape and safety of vehicles, pedestrians and cyclists. All parking spaces will be provided with safe access and egress and have been designed with adequate sightlines to reduce potential conflicts between vehicles, pedestrian and cyclists. As noted in B3.2.1(5) above, the proposal, being for Drury Centre, will provide employment opportunities, open spaces, will facilitate connections to the nearby Drury developments, and will be located within close proximity to the Drury Central Rail Station.
(11) Require subdivision to be designed to achieve a high level of amenity and efficiency for residents by: (a) aligning roads and sites for maximum sunlight access where topography and parent site shape allows; and (b) aligning sites to the road to maximise opportunities for buildings fronting the road.	The roading within the site has been aligned to achieve maximum sunlight access where the topography provides for this. Further, dwellings have been designed to front the proposed roads and JOALs.

(12) Limiting rear sites to places where the site topography, existing boundaries, natural features, or scheduled places will prevent the creation of front sites.	A fine grain road network is proposed so that many lots are provided fronting a road. In the Stage 1 area under this proposal, a total of 40 lots across the 292 proposed are regarded as rear lots due to access being limited to the JOAL. This is primarily due to the block depth to the north which is approximately 60m. The site provides for rear sites to be accessed via JOALs to provide for efficient, appropriate and affordable lot sizes, and to minimise impervious areas.
(13) Require subdivision to deliver sites that are of an appropriate size and shape for development intended by the zone by: (a) providing a range of site sizes and densities; and (b) providing for higher residential densities in locations where they are supportive of pedestrians, cyclists, public transport and the viability and vibrancy of centres.	The proposal includes a variety dwelling typologies. A higher-density of residential dwellings are provided in proximity to the Drury Centre, where they will be supported by the several amenities that the centre affords.
(14) Encourage the design of subdivision to incorporate and enhance land forms, natural features, and indigenous trees and vegetation.	The layout and design of the subdivision has been specifically designed to reduce adverse environmental effects, including maintaining and enhancing natural watercourses where practicable. The subdivision will retain natural features such as natural contours, waterbodies and vegetation where possible. The subdivision layout has where practicable been designed to respond to the physical characteristics of the site, including providing for a development layout and road network that complements the natural contouring, watercourses and open space.
(15) Encourage shared vehicle access by way of rear lanes where appropriate to avoid the proliferation of vehicle crossings that: (a) creates adverse effects on the safety of the road and footpath; (b) limits opportunities to plant street trees; or (c) creates inefficiencies in the provision of on-street car parking or areas for bus stops.	Access to some sites has been provided via JOALs, which will reduce the number of vehicle crossings onto roads that will experience higher volumes of traffic.

(16) Require shared vehicle access to be of a width, length and form that: (a) encourages low vehicle speed environments; and (b) provides for the safety of users of the access and the adjoining road network.	All JOALs have been designed to ensure the safety of users, both using the access and within the adjoining road network, for the reasons discussed within the ITA.
(17) Require sufficient road reserves to accommodate the needs of: (a) different types of transport modes; (b) stormwater networks; (c) network utilities; and (d) lighting, street furniture, landscaping and reticulated infrastructure in a way that will not create future safety and maintenance issues.	The proposed road reserve layout will provide the ability for pedestrian, bicycle, public transport and personal vehicle use. Stormwater networks, network utilities and street infrastructure will be located within the road reserve as required.
(18) Require subdivision to provide for the recreation and amenity needs of residents by: (a) providing open spaces which are prominent and accessible by pedestrians; (b) providing for the number and size of open spaces in proportion to the future density of the neighbourhood; and (c) providing for pedestrian and/or cycle linkages.	The proposed subdivision will provide for open space areas which will be accessible for pedestrians. Several open space walkways including next to Hingaia Reserve and close to private wetlands are proposed. The road network has been designed to achieve a safe pedestrian environment. Internal pedestrian and cycle linkages will be provided.
(19) Require subdivision to provide servicing: (a) to be coordinated, integrated and compatible with the existing infrastructure network;	As noted by the Infrastructure Report, the development will be adequately serviced by infrastructure to be provided prior to or at the same time as the subdivision.

(b) to enable the existing network to be expanded or extended to adjacent land where that land is zoned for urban development; and (c) to enable electricity and telecommunications services to be reticulated underground to each site wherever practicable.	
(20) Require sites capable of containing a building, in areas where service connections are available to a public reticulated network, to connect to the following networks: (a) wastewater; (b) stormwater; and (c) potable water.	
(21) Require sites capable of containing a building, in areas with no reticulated water supply, stormwater or wastewater network, to be of a size and shape that provides for: (a) the treatment and disposal of stormwater in a way that does not lead to significant adverse off-site effects including degraded water quality, erosion, land instability, creation or exacerbation of flooding; (b) management of wastewater via: (i) an on-site wastewater treatment system, or (ii) approval to connect to a private wastewater network; and	

(c) potable water.	
(22) Require subdivision to be designed to manage stormwater: (a) in accordance with any approved stormwater discharge consent or network discharge consent; (b) in a manner consistent with stormwater management policies in E1 Water quality and integrated management; (c) by applying an integrated stormwater management approach to the planning and design of development in accordance with stormwater management policies in E1 Water quality and integrated management; (d) to protect natural streams and maintain the conveyance function of overland flow paths; (e) to maintain, or progressively improve, water quality; (f) to integrate drainage reserves and infrastructure with surrounding development and open space networks; and (g) in an integrated and cost-effective way.	The proposal is considered to be consistent with the stormwater management policies in E1 Water quality and integrated management for the reasons outlined in the assessment of E1 objectives and policies above.
(23) Manage subdivision and development to avoid, remedy or mitigate adverse effects on infrastructure including reverse sensitivity effects, which may compromise the operation and capacity of existing or authorised infrastructure.	As noted in B3.2.1(6) above, infrastructure will be specifically provided to service the proposed development, ensuring compatibility.

(24) Require esplanade reserves or strips when subdividing land adjoining the coast and other qualifying water-bodies.	The subdivision provides for an esplanade reserve adjacent to the Hingaia Stream which will be vested with Auckland Council.
(25) Avoid reducing the width of esplanade reserve or strip, or the waiving of the requirement to provide an esplanade reserve or strip, except where any of the following apply: (a) safe public access and recreational use is already possible and can be maintained for the future; (b) the maintenance and enhancement of the natural functioning and water quality of the adjoining sea, river or other water body will not be adversely affected; (c) the land and water-based habitats on, and adjoining, the subject land area will not be adversely affected; (d) the natural values, geological features and landscape features will not be adversely affected; (e) any scheduled historic heritage places and sites and places of significance to Mana Whenua will not be adversely affected; (f) it can be demonstrated that the reduced width of the esplanade reserve or strip is sufficient to manage the risk of adverse effects resulting from natural hazards, taking into account the likely long term effects of climate change; (g) it can be demonstrated that a full width esplanade reserve or strip is not required to maintain the	An esplanade reserve relating to Hingaia Reserve will be vested as part of the subdivision. The proposal involves subdivision with a reduction of the esplanade reserve to 19.5m at the pinch point abutting Lot 507 as a road to vest but for the most part a full 20m width is provided.

natural character and amenity of the coastal environment; (h) a reduced width in certain locations can be offset by an increase in width in other locations or areas which would result in a positive public benefit, in terms of access and recreation; (i) restrictions on public access are necessary to ensure a level of security for business activities in limited circumstances having regard to the policies in B8.4 relating to public access and open space in the coastal marine area; or (j) direct access to the sea or other water body is required for a business activity in limited circumstances.	
(26) Require esplanade reserves rather than esplanade strips unless any of the following apply: (a) land has limited conservation and recreational value; (b) conservation and historic heritage values that are present can be adequately protected in private ownership; (c) the opportunity to acquire an esplanade reserve is unlikely to arise but continuity of access is desirable; (d) creation of esplanade strips can secure public benefits and resource management objectives without alienating land from private ownership;	N/A – not relevant to this proposal

(e) land is subject to natural hazards or stability issues taking into account the likely long term effects of climate change; or (f) a marginal strip of at least 20 metres under the Conservation Act 1987 has not been set aside on land that is Treaty Settlement Land.	
(27) Manage the existing pattern and density of subdivision in locations identified in the Subdivision Variation Control shown on the planning maps to protect their low density character.	N/A – the site not subject to a SVC
(28) Avoid subdivision that detracts from the natural landscape qualities which are defined by the low-density settlement pattern.	The subdivision layout has been designed to respond to the physical characteristics of the site, including providing for a development layout and road network that complements the natural contouring, watercourses and open space.
(29) Manage subdivision of land where there are known infrastructure constraints.	As noted by the Infrastructure Report, development will be adequately serviced by infrastructure to be provided prior to or at the same time as the subdivision.
(30) Maintain the distinctive pattern of subdivision as identified in the character statements for special character areas.	N/A