

Drury Metropolitan Centre Fast-track

Auckland Council Specialist Memo

Annexure 3:

Auckland Transport

Matthew Ford & Chris Freke

11 August 2025

Specialist Response – Auckland Transport – Fast-track Approvals Act 2024 – Drury Metropolitan Centre Application

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EXECUTIVE SUMMARY

1. This specialist response assesses Kiwi Property's (**Applicant**) Fast-track application for the Drury Metropolitan Centre, a large-scale mixed-use development, incorporating residential activity and a commercial retail centre (**Application / Project**).
2. Auckland Transport (**AT**) acknowledges the project's potential regional benefits but identifies several transport-related risks and adverse impacts, particularly around trip generation assumptions, infrastructure staging, and reliance on unfunded upgrades.
3. The Application substantially exceeds development thresholds that trigger major transport upgrades under the Auckland Unitary Plan (**AUP**) I450 Drury Centre Precinct, such as the SH1 off-ramp, Drury South Interchange, and Mill Road connection. There is no confirmed funding or delivery timelines for these projects.
4. AT raises concerns about the Applicant's modelling, including work-from-home adjustments and optimistic retail trip assumptions, which may underestimate traffic impacts.
5. AT is also concerned the Applicant's approach of seeking to consent development to levels well beyond the capacity of funded and committed infrastructure upgrades to service it undermines the integrity of the AUP precinct transport trigger provisions and would have an adverse impact on the development feasibility of the land within the associated Drury Precincts that are also subject to these standards. The long lapse period proposed is also a concern as the level of consented land use is a consideration when assessing applications for subdivision and development in these precincts.
6. Additional issues include the use of private roads for public transport, insufficient loading bays, and safety risks at intersections and crossings.

7. AT considers that several transport-related matters require further technical input and assessment by the Applicant's experts. While it is somewhat premature to comment in full on the proposed conditions, pending this further technical assessment by the Applicant's experts, AT provides initial comments on the proposed conditions to assist the Panel. This includes specific recommended amendments and new / additional conditions. AT's recommendations are directed at mitigating the development's effects and ensuring safe, efficient transport outcomes, and also at ensuring development staging is supported by the timely delivery of infrastructure.
8. In this latter regard, AT recommends binding staging conditions and monitoring / review frameworks to ensure development aligns with infrastructure readiness. Given the scale of development proposed and the current uncertainty regarding the timing and delivery of key transport upgrades, there is a possibility that the proposal's adverse transport effects could be significant.
9. AT does not oppose the Application, however this is subject to:
 - a. the provision of further information and assessment by the Applicant; and
 - b. the imposition of appropriate consent conditions addressing the matters raised in this specialist response, including to reduce the extent of development consented.
10. The question of whether a reduction in the extent of consented development can be achieved via conditions, or whether it represents a partial grant/partial decline, is at least in part a legal matter, which the Council's / AT's legal memorandum will address. However, in terms of the Fast-track Approvals Act 2024 framework, AT's assessment is that there is a prospect that, for the later levels of development that are reliant on unfunded/unprogrammed and therefore uncertain road upgrade projects, the project's adverse impacts would be out of proportion to the project's benefits.
11. Expert conferencing may assist in resolving key concerns and refining draft conditions.

QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

Chris Freke

12. Chris Freke is a Principal Planner at AT. Chris's responsibilities include leading AT's response to relevant spatial planning proposals, notices of requirement and plan changes within the Auckland Region. Chris has over 30 years' experience as a planner and transport planner. This includes working as a principal planner at WSP/Opus and prior to this at the former Manukau City Council. He has a bachelor of Town Planning and is a full member of the New Zealand Planning Institute.

13. Chris's previous experience with land use and transport projects includes the following:
- a. Preparation of the transport, subdivision and development related sections of the Manukau District Plan.
 - b. Preparation of the transport components of many structure plans including those for Flat Bush and Beachlands Maraetai.
 - c. Responsible for assessment of transport aspects of resource consent applications for subdivision and development as well as the transport related financial contribution and development contribution provisions and processes.
 - d. Responsible for planning, land acquisition, consenting and delivery of a number of major transport projects including Ti Irirangi Drive, Highbrook Drive and the Manukau Rail Link.
 - e. Preparation of integrated transport assessments and traffic assessments including for the Ormiston Town centre (including residential components) and AUT Manukau campus.
 - f. Expert and specialist transport evidence for AT and Auckland Council in respect of private plan changes including Drury Silverdale, Beachlands Maraetai and Clevedon.

Matthew Ford

14. Matthew Ford is a Senior Development Planner - Network Operations Planning at AT. Matthew holds the qualification of Bachelor of Urban Planning (honours degree) and has 5 years of experience in planning and transport planning respectively. Matthew is an intermediate member of NZPI. Matthew has prepared expert evidence and technical assessments for resource consent applications, plan changes, and fast-track applications and has appeared as an expert witness before consent authorities prior to this consent application.

Code of conduct

15. Matthew Ford and Chris Freke confirm that they have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. They also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. They confirm that the opinions they have expressed are within their areas of expertise and are their own, except where they have stated that they are relying on the work or evidence of others, which they have specified.

STRUCTURE OF SPECIALIST ASSESSMENT

16. This specialist assessment is structured under the following topics:
- (a) Background to the Drury Precincts and associated transport trigger provisions;
 - (b) Work from home trip rates;
 - (c) Trip generation assumptions;
 - (d) Transport Upgrades Staging Modifications;
 - (e) Infrastructure Funding / Provision;
 - (f) Proposed Private roads;
 - (g) Staging;
 - (h) Frontage Upgrades;
 - (i) Vehicle Crossings;
 - (j) Loading Bays;
 - (k) Draft Construction Traffic Management Plan (**CTMP**); and
 - (l) Comment on proposed conditions.

BACKGROUND TO THE DRURY PRECINCTS

17. Areas of the Future Urban Zone at Drury were rezoned to enable urban development through Plan Changes 48, 49, and 50 to the AUP which were made operative on 16 December 2022.
18. Each plan change included a precinct with a standard that set thresholds for development based on the completion of specific transport infrastructure upgrades (**Trigger Table**).¹ These thresholds apply across the combined precincts, i.e. they relate to cumulative developments within the Drury Centre, Drury East and Waihoehoe AUP precincts created through Plan Changes 48, 49, and 50 (together "**Precincts**").
19. The thresholds are expressed in terms of the number of residential dwellings, and gross floor area (**GFA**) for retail, commercial, and community activities. The thresholds are a proxy for the associated trip generation. While they do not explicitly reference vehicle trip generation numbers, they were underpinned by an assumed trip generation for each different land use. These also reflected the anticipated timing and staging of the transport network upgrades known at that time.

¹ Table I450.6.2.1 in the case of PC48/ Drury Centre.

20. The intent was to facilitate development in conjunction with transport upgrades and achieve integration of land use with infrastructure. Under Rule I450.6.2, the thresholds in the Trigger Table are deemed to be met if the required transport infrastructure is either:
- a. already constructed and operational;
 - b. under construction with relevant consents/designations in place and the application expressly made on the basis that the infrastructure will be operational prior to occupation (for land use) or section 224(c) certification (for subdivision); or
 - c. proposed to be constructed by the applicant as part of the consent, with express agreement that it will be operational prior to occupation or section 224(c) certification.
21. This rule framework was intended to permit development to occur concurrently with construction of infrastructure, while ensuring that occupation or completion of subdivision could occur until the required infrastructure upgrades are operational.
22. For the purpose of assessing development levels against the Trigger Table the standard included those activities that have a land use consent, or subdivision that has a section 224(c) certificate that creates additional vacant lots. This was intended to prevent consent being granted for development that would exceed the applicable threshold where the necessary infrastructure is not yet in place, under construction, or secured by condition. In practice, applications that have been lodged but not yet decided may also need to be considered when assessing cumulative development levels.
23. Activities which do not meet the standard are either non-complying or discretionary activities under the Precincts, depending on the specific element of Table I450.6.2.1 that is not met. Whilst the AUP typically does not include matters for discretion or assessment criteria for such activities, the special information requirements for any applications to infringe standard I450.6.2 clearly signal the considerations that will apply to the assessment of such applications.
24. As will be explained in greater detail below, the Application proposes to significantly depart from the Trigger Tables by:
- a. Deferring the delivery of the Direct connection from State Highway 1 to the Drury Centre via a single lane slip lane from SH1 interchange to Creek Road (**Direct Connection**), Drury South Interchange, and Mill Road connection; and
 - b. Obtaining resource consent for stages of development well beyond the capacity of constructed funded and committed infrastructure upgrades to support that development.

25. This memorandum now discusses aspects of the Applicant's transport modelling which seek to justify this departure, and then addresses in more detail the nature and scale of the departures from the Trigger Table and potential effects.

WORK FROM HOME TRIP RATES

26. AT has concerns about the reliability of the assumed work from home (**WFH**) discount factor used in the trip generation calculations in the Drury Centre Stage 2 Integrated Transportation Assessment Report (**ITA**) prepared by CKL. AT considers that that the assessment should be revised based a lesser and more appropriate discount.
27. The Applicant has revised down the trip generation rates which were adopted in support of the plan change for the underlying zoning to reflect an increase in the number of employees working from home. WFH has seen a large increase since the COVID 19 pandemic period and since the initial transport modelling was undertaken to support the plan change and associated precinct rules. The Applicant asserts that with this reduced trip generation, a greater number of households and more GFA can be provided than indicated within the Trigger Tables², while still generating the same overall level of demand used to set the original thresholds for required transport infrastructure.
28. The Applicant has applied an 8% reduction to residential activity trip generation (which equates to a 9% increase in dwelling yield before a threshold is met triggering the requirement for infrastructure upgrades). A 1.5% reduction has also been applied to retail activities. AT considers that the 1.5% reduction for retail is not well supported given the customer facing nature of this activity and requires more evidence, especially when considering new retail activities.
29. While AT accepts that WFH is much more prevalent now than in the pre-Covid 19 pandemic period, and that it is reasonable to expect some reduction in commuter peak period trip generation rates when comparing with pre-2020 data, the proposed reduction for retail activities remains unsubstantiated.
30. The Applicant's assessment is based solely on the increased prevalence of WFH between the 2018 and 2023 censuses period. It appears to apply a reduction factor based on the home-to-work journey across all household trip types. This approach, however, considerably overstates the impact of WFH, as the census journey to work data only relates to the home to work trip, when there are other trip purposes which make up part of household related trips during peak periods.
31. Whilst the Applicant refers to household travel survey data, it is more important to reflect assumptions used in the transport models that supported the original plan changes and set the precinct development thresholds. Standard transport modelling breaks demand into different trip purposes, including home to work, home to other, non-home based etc. This

² Table I450.6.2.1 Threshold for Subdivision and Development as shown on I450.10.4 Drury Centre: Precinct Plan 4.

was also the approach adopted for modelling assessment underpinning the original plan changes.

32. Commuter trips account for only approximately 39% of all household related trips, and many of the other trip types are unlikely to be influenced by an increase in the percentage of employees working at home. Therefore, any discount applied to total household trip generation should be applied to no more than 40% of the base commuter trip reduction (e.g. approximately 3% overall reduction, if based on an 8% reduction of the commuter component of trip generation). It is also not clear that traffic levels have actually fallen on main arterials and motorways, which would be expected to be the case if the Applicant's logic was correct.

Recommendations for WFH

33. Given these issues, AT cannot support the WFH adjustment applied by the Applicant or fully understand the potential extent of adverse effects on the transport network from the Application.
34. AT recommends that the Applicant avoids using the WFH adjustment until it is further supported by sufficient evidence, and that the Applicant instead recalculates the trip generation with either no WFH adjustment, or a significantly lower factor. This would also provide a better understanding of whether the WFH reduction is the factor that causes the application to avoid meeting the threshold/trigger for transport infrastructure upgrades until higher levels of development than anticipated in the precinct provisions. Even if the reduction is demonstrated not to be overly material for this application, acceptance of the suggested discount would create a precedent for all other future applications within the Drury East Precincts (and potentially elsewhere).
35. If the Application is consented on the basis of the Applicant's WFH assumptions, AT recommends a condition of consent such that the traffic effects are monitored over time to assess whether the Applicant's assumptions are borne out in practice and mitigated if/when adverse effects are generated, supported by an appropriate review condition.

TRIP GENERATION ASSUMPTIONS

36. The ITA proposes substituting a portion of residential dwellings that were assumed under the plan change modelling with retail and commercial GFA while remaining within the same peak-hour trip generation thresholds. This is based on modelling focused on the Waihoehoe Road / Great South Road intersection. While this may be feasible within the modelled thresholds, the assumptions appear to be optimistic and context sensitive. A more conservative and adaptive approach should be adopted to ensure the wider transport network can accommodate the proposed land use mix without compromising safety, efficiency, or mode shift objectives.

37. The ITA relies on standardised rates from the Supporting Growth Alliance (**SGA**) Drury Infrastructure Funding and Finance (**DIFF**) model and Stantec's modelling. However, retail trip generation, especially for Large Format Retail (**LFR**), is highly variable and can attract significant regional traffic, particularly on weekends. The assumption that most retail trips are pass-by³ or internalised may not hold during early development phases when the local catchment is limited.
38. Retail and commercial trips are assumed to be more evenly spread throughout the day, reducing peak-hour impacts. While this may apply to some commercial uses, LFR can still generate substantial PM peak and weekend traffic, which may not be fully captured in weekday modelling.
39. The modelling assumes high internalisation and mode shift due to the site's proximity to the Drury Central Rail Station and active mode infrastructure. However, achieving these benefits is dependent on both the timely delivery of this infrastructure and the maturity of the surrounding urban form, which may lag behind the initial stages of development.
40. The modelling focuses primarily on the Waihoehoe/Great South Road intersection, potentially overlooking cumulative impacts on the wider network, including secondary intersections, collector roads, and local access points.
41. The ITA introduces a revised development/infrastructure sequencing table (see Table 11 in the ITA, as updated in CKL's s67 response – discussed further below) that allows for increased retail/commercial GFA in exchange for fewer dwellings, while remaining under the 2,000vph peak-hour threshold⁴. This approach carries risk if real-world trip generation deviates from assumptions. The deferral of the SH1 Direct Connection (originally intended to support higher trip volumes) may exacerbate pressure on the Waihoehoe/Great South Road intersection, particularly under a retail-heavy scenario.
42. Overall, each assumption introduces a degree of risk. If real-world conditions diverge from the modelling inputs especially in terms of trip generation, timing, and infrastructure delivery, the transport network may experience adverse effects such as increased delays and safety effects on Waihoehoe/Great South Road (**GSR**) intersection, adjoining arterial roads, collector roads, SH1, secondary intersections and collector roads. The effects could be acceptable if sufficient mitigation is provided by the Applicant to ensure that the transport network can handle increased traffic volumes which have the clear potential to arise from the Project.

³ Pass-by trips refer to vehicles already on the road that stop at a retail site en route to another destination. Internalised trips occur within the development, such as residents shopping locally. These trip types typically have less impact on external traffic volumes.

⁴ The 2,000 vehicles per hour (vph) threshold is a benchmark used to determine when additional infrastructure is needed to maintain acceptable traffic flow and safety.

Recommendations for trip generation assumptions

43. AT makes the following recommendations with regard to trip generation assumptions:
- a. Additional sensitivity test modelling should be undertaken by the Applicant to test higher retail trip generation scenarios, including weekend peaks and lower internalisation rates. Desktop modelling using existing data can validate whether substituting dwellings with retail/commercial GFA remains feasible under more conservative assumptions..
 - b. A robust travel demand management and monitoring framework should be implemented at each stage of development to validate assumptions and adjust development thresholds if needed. Monitoring is a standard practice in large developments. It can be scoped proportionately and does not require upfront infrastructure. It provides flexibility if the network performs better than expected, development can proceed faster; if worse, it allows for adaptive management. An improved section 128 RMA review condition should also be imposed.

TRANSPORT UPGRADES - APPLICANT'S PROPOSED STAGING MODIFICATIONS

44. The Application is for the following development:
- 102 dwellings (consisting of apartments and terrace housing) with a total floor area of 14,938sqm.
 - 63,547sqm of Retail activities.
 - 33,048sqm of Commercial activities.
 - 10,216sqm of Community activities.
 - 17,168sqm of visitor accommodation (consisting of a total of 282 rooms).
45. This would take the total level of development within the three precincts to:
- 1,008 dwellings.
 - 95,547m² GFA of retail.
 - 33,048m² GFA of commercial.
 - 10,216m² GFA of community space.
46. It should be noted that this includes Fulton Hogan stages 4-7 ,which rely on the same ITA assessment as has been proved with this fast-track application but is not yet consented.

47. This FTAA Application proposes a significant amount of development, far exceeding some of the threshold points set out the Trigger Table, but without providing the corresponding supporting transport infrastructure at the time anticipated. Under Table I450.6.2.1 of the AUP, the infrastructure anticipated to accompany this level of total development includes:
- a. State Highway 1 widening – Stage 1, being six lanes between the Papakura interchange and Drury interchange;
 - b. Drury Central train station, including a pedestrian connection to Waihoehoe Road;
 - c. The Direct Connection.
 - d. The ultimate Waihoehoe Road upgrade between Fitzgerald Road and Great South Road.
 - e. Mill Road southern connection between Fitzgerald Road and State Highway 1, providing four traffic lanes and separated active mode facilities, including a new SH1 Interchange at Drury South.
48. The Applicant is proposing to delay the provision of the Direct Connection, Drury South Interchange and Mill Road southern connection from the timings anticipated in the Trigger Table.
49. As noted above, the Applicant has adjusted the mix of residential, retail, and commercial land uses to better match its projections of current demand while trying to stay within its assessment of traffic capacity limits which are based on the WFH and trip generation assumptions discussed above. A new table has been created in the ITA which the Applicant proposes should guide what development can happen at each stage of infrastructure completion (**Table 11** – the version below is as updated in CKL’s s67 response dated 21 July 2025):

Image 5: Updated Development / Sequencing Table with trip generation thresholds highlighted

Row	Transport Infrastructure	Expected Completion	Level of Development enabled by Transport Infrastructure				
			Residential (Dwellings)	Retail (GFA)	Commercial (GFA)	Community (GFA)	Drury East Peak Hr Trip Gen
(a)	Existing GSR / Waihoehoe roundabout	N/A	Up to 600 units	Up to 5,000sqm	-	-	Up to 800 trips
(b)	Waihoehoe Road Ultimate upgrade incl full GSR/Waihoehoe signalisation	Early - mid 2028	600 to 1,100 units	5,000 to 32,000sqm	-	-	800 to 2,000 trips
	Drury Central Rail Station	Late 2026					
(c)	SH1 Six-laning Papakura to Drury.	2030	1,100 to 2,660 units	32,000 to 71,000sqm	-	-	2,000 to 3,800 trips
(d)	Mill Road southern connection (Fitzgerald to SH1 (incl. Drury South Interchange))	Not programmed	2,660 to 3,300 units	71,000 to 78,500sqm	up to 6,000sqm	Up to 600sqm	3,800 to 4,300 trips
	SH1 direct southbound connection	Not programmed					
(e)	Mill Road northern connection	Not programmed	3,300 to 5,800 units	78,500sqm to 97,000sqm	6,000 to 47,000sqm	600 to 10,000sqm	4,300 to 5,600 trips
	Opaheke northern link	Not programmed					
(f)	Assessment of PT uptake required	N/A	5,800 to 6,400 units	97,000 to 108,000sqm	47,000 to 60,000sqm	10,000 to 16,000sqm	5,600 to 6,000 trips

50. The adverse effects on the local network of adjusting the development thresholds are not fully understood and the effects this would have on the surrounding AT network are also uncertain. The Applicant has relied on previous modelling undertaken as part of plan change 48, but this proposed change in the thresholds has not been modelled clearly and is based on questionable trip generation and WFH assumptions. It is not understood if/how the transport network could manage the new levels of development without supporting infrastructure that would have been otherwise required under the precinct provisions.
51. As stated above, the Applicant seeks to defer the delivery of the Direct Connection, Drury South Interchange and Mill Road southern connection as per Table 11. The Applicant's apparent basis for this is the substantial amount of commercial and retail GFA proposed. The Applicant's revised modelling indicates that the Direct Connection, Drury South Interchange and Mill Road southern connection only provide benefits towards the later stages Drury's development. AT does not fully agree with this assumption and seeks that conditions be imposed requiring these important transport upgrades be in place at an earlier stage of the development. The table below compares the Applicant's proposed timing for the Direct Connection with the AUP Triggers Table:

Land use	AUP Table I450.6.2.1(c)	Table 11 Row (d) (s67 response version)
Dwellings	1,800	2,660
Retail GFA	32,000m ²	71,000m ²

Other commercial GFA	8,700m ²	6,000m ²
Community GFA	1,000m ²	600m ²

52. The function and need for the Direct Connection is outlined within the Drury Infrastructure Funding and Financing Study (**DIFF**) Transport Assessment August 2021 which is included to Appendix 1 of the stage 2 ITA. This work concluded that the Direct Connection was needed both short and long-term, even with Mill Road in place. A table with traffic volumes on roads within and without the Direct Connection indicated it would carry around 7,000 trips per day of southbound traffic from the southern motorway. Without the Direct Connection this traffic would need to navigate Great South Road between the Motorway off ramp to Drury and Waihoehoe Road, then travel along Waihoehoe road before turning right to access the centre via either the Station access road opposite Kath Henry lane or, if roads 3 and 6 are not in place Fitzgerald Road, or a combination of both.
53. Whilst there will be additional capacity provided at the intersection of Great South Road and Waihoehoe Road as a result of the ultimate form of this project being delivered earlier than anticipated, this will not address the effects of additional traffic on Waihoehoe Road or its intersections with station access road and Fitzgerald Road. This also has the potential to affect the efficiency of bus services to and from the station and potentially interpeak levels of service. The Trigger Table anticipated that both the Direct Connection and the ultimate Waihoehoe upgrade would be required to enable:⁵
- 3,300 dwellings; and/or
 - 56,000m² retail GFA; and/or
 - 17,900m² other commercial GFA; and/or
 - 2,000m² community GFA.
54. The ITA references, but does not include, modelling results relating to scenarios with and without the Direct Connection. It also only considers impacts on the Great South Road Waihoehoe intersection and not on Waihoehoe Road itself. AT have suggested a session with the Applicant to better understand the reasoning behind the suggested deferral of the Direct Connection and confirm analysis has addressed all potential effects from it. The effects of deferring the Direct Connection could include:
- Circa 7,000 trips per day being redistributed to Great South Road and Waihoehoe Road and respective intersections such as Kath Henry Lane and Fitzgerald Road which would have otherwise been captured by the SH1 off ramp. This redistribution puts more

⁵ Table I450.6.2.1 Row (d).

pressure on the AT network and the intersections, increasing queuing and delays and decreasing the operation and safety of the intersections. This pressure could also bring forward the need for Great South Road four-laning upgrade between SH1 and Waihoehoe Road, which is much earlier than anticipated.

- This would then cause interpeak level of service D⁶ for key intersections, causing delays on the transport network.
- This in turn would result in reduced efficiency for public transport, particularly at the Waihoehoe Road / Kath Henry Lane intersection where public transport would be susceptible to delays and queuing.

55. In addition, whilst the models are underpinned by assumed trip rates for standard retail and commercial land uses there is the potential to provide a “mega attractor” bulk format retail use which is likely to have a wide catchment and generate traffic well in excess of these rates. This has occurred at Westgate with Costco and Sylvia Park with the soon to be opened Ikea. The AUP trip generation provisions do not apply within the Precinct⁷ and so there needs to a conservative approach taken when assessing change to defer the provision of transport infrastructure such as the Direct Connection to address the possibility of such activities establishing.
56. The Applicant’s proposed grouping of the Direct Connection with the new NZTA interchange is also problematic because there is no incentive by developers to provide the Direct Connection ahead of the NZTA interchange as both need to be in place. It is recommended that it be given its own threshold row with corresponding enabled development. The default would be a level based on row (d) of the Trigger Table (subject to any agreed alternative mix of enabled land uses). This is critical as the Applicant is the only entity capable of providing or funding it and this has always assumed to be the case in Council’s planning and funding mechanisms for the area.
58. AT notes that row (f) in Table 11 from the ITA (as updated in the s67 response) references an assessment of public transport uptake⁸ at each specified development threshold. However, AT could not identify anything specific in the application documents explaining how the uptake was calculated or how it could be secured through conditions of consent. To be effective, the public transport assessment required at the trigger points would need to show that public transport uptake is sufficient, and that vehicle trip generation has been correspondingly reduced, to permit more development. In the absence of this being

⁶ Level of service (LOS): An index of the operational performance of traffic on a given roadway, traffic lane, approach, intersection, route or network. This represents the quality of service, measured on an A to F scale, with LOS A representing the best operating conditions from the traveller’s perspective and LOS F the worst.

⁷ Rule I450.6(2)(b).

⁸ Public transport uptake refers to the proportion of trips made using buses or trains instead of private vehicles. Higher uptake can reduce traffic congestion and delay the need for road upgrades.

demonstrated, development would need to be paused until appropriate additional mitigation is in place.

59. The Applicant has not demonstrated what data and calculations would go into the assessment of public transport uptake and what uptake levels would need to be met to determine that public transport is being effective in reducing private vehicle trip generation. Additionally, the Applicant has not confirmed what planning mechanism is proposed to ensure this level of assessment is provided at the relevant time. AT is of the view that while there is insufficient analysis of this matter, it could be resolved by a consent condition or conditions. The Applicant should draft this condition accordingly.

Recommendations for Transport Upgrades Staging Modifications

60. Overall, the methodology for the proposed recalculation of transport upgrades is unclear, as the detail of the supporting analysis has not been provided. Without this information, AT cannot be sure of how critical the full extent of adverse effects may be on the transport network. AT recommends that Applicant should be required to provide additional information for each activity type and on each row of the proposed Table 11:
- a. specify and justify the trip generation rate used (specifying the rate per activity type and for each relevant year of stage);
 - b. clearly reference these trip generation rates back to the specific rates in the Southern Growth Alliance (SGA) report⁹;
 - c. identify how this Application impacts other land uses e.g. consent needs to clearly reference the remaining development capacity within the three precincts;
 - d. Provide robust conditions to capture more appropriate commitments to transport infrastructure at the appropriate stages; and
 - e. Provide robust conditions to monitor public transport uptake, backed by a review condition.
61. Once this information is provided, AT would be able to comment on appropriate conditions on which the Application could be granted.

IMPACTS ON DEVELOPMENT FEASIBILITY OF REMAINDER OF AUP PRECINCTS

62. The Applicant is seeking resource consent for the ultimate proposed level development with conditions preventing stages of development from proceeding ahead of certain infrastructure being in place.

⁹ As part of the original Drury Plan Changes SGP undertook traffic modelling utilising a SATURN model which was prepared to support the Drury Infrastructure Funding and Finance Study. This model has been used by multiple transport assessment to date for baseline assumptions for trip generation rates, mode share splits, internalisation assumptions and refined zone system.

63. This approach is not envisaged by the Drury Centre, Drury East or Waihoehoe Precincts' provisions and is potentially very problematic because the Precincts requires Council to account for already consented development when considering any application for land use or subdivision within Precincts. A 15 year lapse period is proposed by the Applicant and there is also no required timeframe provided to give full effect to the consent which may take decades.
64. If consent is granted for the full level of development sought by the Applicant, this would create a situation in which the Applicant has effectively "banked" all the enabled development within the Precincts (except with respect to dwellings). It effectively negates the Precinct provisions and means Council when processing subsequent applications has either to:
- a. Decline them because the "environment" already includes the full development provided for by the FTAA consent, albeit that this development may not materialise for decades; or
 - b. Consent them on the basis that the effects of the FTAA consent will not materialise for many years, thereby creating a risk of development occurring ahead of the infrastructure required to serve it and undermining the integrity of the Trigger Table.
65. Approving the scale of the land use sought by the Applicant with the suggested conditions therefore undermines the integrity of the Precinct standards and makes them almost unworkable, while also impacting on the feasibility of development in the remainder of the Precincts.
66. Even if NZTA were to build the Mill Road southern connection, the enabled capacity would immediately be "consumed" by the Applicant's already consented land uses. This goes against the wording and intent of the Trigger Table which was to consent development only in conjunction with the provision of infrastructure that was in place, conditioned to be provided, or under construction.
67. The "banking" of enabled development capacity with no timeframes on when it is to occur or no obligation to provide transport infrastructure also creates funding risks for council. This is because it could also potentially prevent other development and the associated development contributions that Council is relying on to fund its infrastructure upgrades. At the same time any funds from the applicant's development will only be received when it decides to develop.

Recommendations

68. AT therefore recommends that:

- a. Consent is granted to a lesser scale of development reflecting committed or conditioned upgrades so that there is not a “banking” of as much development capacity within this application;
- b. The lapse date of the application is brought forward so that development rights are required to be used rather than banked for extensive time periods.

INFRASTRUCTURE FUNDING / PROVISION

- 69. We now comment on the infrastructure funding status of the transport upgrades that are required to service the build out of Drury.
- 70. The Direct Connection is already consented but not yet constructed. There is no confirmed funding or delivery timeline. The Applicant indicates this upgrade could be done as part of Papakura to Drury upgrade project, but no commitments have been made to capture this. It was assumed in development contributions to be entirely developer funded and delivered earlier than the new commitments. The Applicant must demonstrate more clearly how the transport network will perform without this connection in place.
- 71. A new interchange connecting SH1 to Quarry Road (east) and Great South Road (west) is also required. This includes a new overpass and is part of the Papakura to Bombay (P2B) Project – Stage 2 and is to be delivered by NZTA. This transport upgrade is also triggered at row (d) of the Applicant’s development sequencing table (Table 11) and is required to support the same level of development as the SH1 off-ramp. The Notice of Requirement (**NoR**) for this interchange was lodged February 2024, notified June 2024 and granted by a decision of 15 July 2025 and is undergoing the appeals process. However, there is no confirmed funding or delivery timeline.
- 72. The cost of this infrastructure (while not specified by NZTA) is likely to fall within the range \$150–\$250 million based on comparable interchange projects and the scale of the Drury South initiative. AT is concerned that the Applicant’s proposal relies on this infrastructure without a clear commitment to its delivery. Without it, the local network may not be able to accommodate the proposed development volumes. AT recommends that the Applicant demonstrates more clearly how the network will perform without this connection in place.
- 73. The southern connection of Mill Road is a future arterial corridor intended to connect Drury South to the wider Mill Road corridor. The Mill Road southern connection would link to the Drury South Interchange. This is required at row (d) of the Applicant’s development sequencing table (Table 11) and is required to support the same level of development as the SH1 off-ramp and Drury South Interchange. Mill Road Southern Connection is not currently funded or committed for delivery in the Drury area. The Applicant assumes it will be needed only once development exceeds the row (d) threshold in its Table 11.

74. There is concern that the absence of Mill Road southern connection could limit network resilience and increase pressure on SH1 and local roads. The Applicant's proposal relies on Mill Road South being delivered, but there is no confirmed funding or commitment from government agencies. Mill Road South becomes essential to avoid congestion and maintain acceptable performance at key intersections once development reaches row (d) thresholds of the applicant's development sequencing, which the proposal anticipates reaching. It is considered a critical upgrade to support higher development thresholds, particularly when traffic volumes begin to exceed the capacity of the Great South Road / Waihoehoe Road intersection. Auckland Transport raises concerns that, without this connection, future developers may face inequitable financial responsibility for delivering critical infrastructure.

Recommendations for Infrastructure Funding

75. While this proposal could accelerate economic and housing development, it also risks undermining strategic planning, straining public resources, and creating long-term inefficiencies. AT therefore recommends the following:
- a. A condition requiring provision of the Direct Connection at an earlier appropriate stage of development
 - b. Set up a monitoring condition to require the Applicant to submit annual reports to Auckland Council and AT confirming development progress, infrastructure delivery status, and compliance with staging conditions, back by a review condition.

PROPOSED PRIVATE ROADS

76. The Applicant has proposed a network comprising a mix of public and private roads. Generally, the public roads are those identified as collector roads within the precinct plan and the private roads are the main internal centre roads and retail main street. AT has no issue with local private roads as long a reasonable level of local connectivity is achieved which is aligned with the precinct plan. However, issues can arise when collector roads and passenger transport routes are proposed to be private. This is the case with Road 6 (east west collector) and the Road 3 link to Flanagan Road and the Drury Train Station.
77. AT refers to two relevant policies of the Drury Centre precinct that guide the design of the public transport network: Policies I450.3 (18)(a) and 8(d)):
- a. Policy 18(a) states: *"Ensure that the adverse effects of traffic generation on the surrounding transport network are mitigated, including by ensuring: ... (a) Public transport can operate efficiently at all times"*.
 - b. Policy 8(d) states: *"Require the transport network to be attractively designed to appropriately provide for all modes of transport in accordance with Appendix 1, including by: ... (d) Providing for the safe and efficient movement of vehicles"*.

78. AT is of the view that proposed transport network layout is largely in accordance with that in I450.10.3 Drury Centre: Precinct plan 3, but not entirely aligned with these policies. This is because public transport will be using private roads in the interim and indefinitely to access the Drury Train Station. The Drury Centre precinct plan provides for an ultimate connection north to the station access road (currently labelled as Road 25). However, there is no obligation on the Applicant to provide this connection beyond their site boundaries. Thus, resulting in public transport needing to use private roads being Roads 6 and 3 until the full extent of Road 25 is built.
79. In a scenario where the Applicant wants to close or reduce access to Roads 6 and 3, public transport will be adversely affected as it will not be able to circulate the transport network efficiently, creating potential delays and costs to AT. AT has experienced many issues in the past where the efficiency and effectiveness of passenger transport services has been adversely affected on the parts of routes and stops not on public roads. This includes at Sylvia Park, where changes to internal intersections have added major delays to the bus services using them.
80. AT is therefore of the view that Road 6 to the eastern boundary and a small portion of Road 3 connecting Road 3 to the Drury Train Station should be vested as public road and to AT standards. Both of these roads will also have a key collector function and provide an alternative route to Fitzgerald Road until such time as Auckland Council is in a position to provide a more direct connection.
81. Additionally, AT recommends a condition of consent requiring the consent holder to notify AT (and NZTA) in advance when/if they close their roads for a street event or other reason and to provide traffic management to limit adverse effects on the AT (or NZTA) networks. AT suggests that traffic management occurs at the interface between the public and private networks when they have a closure.
82. AT supports the intent to have a mini roundabout at the Flanagan / Road 3 intersection. However, it is still not clear if this can safely accommodate buses. AT notes there is also no information provided on vehicle tracking for this intersection where it will be heavily used by public transport. This is not considered acceptable.
83. The Applicant will only be upgrading a small section of Flangan Road to an urban standard. AT notes that where the Designation 6309 boundary is and where the Stage 2 development boundary is, leaves a gap in the road network that will remain as its current standard being an unsealed road. Until Road 25 is fully developed and connected through to the north, this road will be used as interim bus route to connect vehicles and buses to the Drury Train Station. If the Applicant proposes to facilitate buses north through Flanagan Road in the interim (or possibly indefinitely), the Applicant needs to ensure Flangan Road is appropriately upgraded to an urban standard to the extent of Designation 6309 boundary so that it can be suitable for buses to use. There may also be a need to replicate some of

the conditioned upgrades within the stage 1 consents where there are also required to serve stage 2.

84. Policy I450.1 (19) states there should be progressive upgrade of existing roads to an urban standard to provide for all modes and connect with the existing transport network to the Drury Central train station. Not providing this upgrade will create adverse effects on the movement of public transport as buses will be made to use a road that is not suitable enough to carry buses as the road would remain unsealed. To mitigate this adverse effect, AT has recommended a condition of consent to require this upgrade so that the relevant sections of Flanagan Road are upgraded to an urban standard.
85. The proposal includes three signalised intersections exclusively serving private roads and four where a private road connects to the public road. AT is unlikely to accept ownership or operational responsibility for signals if they exclusively or primarily serve private roads. This position is based on several key concerns:
- The significant and ongoing costs for maintenance, repairs, and upgrades, particularly if numerous privately owned signalised intersections are involved. Furthermore, this cost burden could be disproportionate to any public benefit, especially if the privately managed systems are not adequately maintained or efficiently operated. AT would like the Applicant to demonstrate how they anticipate traffic flow will be managed effectively between the public and private road networks.
 - AT is particularly concerned in scenarios where AT may want to prioritise green time for certain modes such as public transport over vehicles using the private developments.
 - Ambiguities in ownership and operational responsibility can lead to complex disputes, which AT seeks to avoid.
86. These issues have usually been addressed by conditions requiring that ATOC¹⁰ is given the opportunity to manage and maintain at the Applicant's cost the maintenance and operation of all privately owned traffic signals.
87. In addition, it is normally the case where the intersection of private and public roads is managed by traffic signals, that the public road reserve includes a short stub which is capable of accommodating any of the signal's equipment. It is recommended that at the Engineering Plan Approval stage, minor adjustments are made, where required, to the

¹⁰ A joint initiative between Auckland Transport and Waka Kotahi NZ Transport Agency, ATOC manages Auckland's transport network 24/7 through real-time monitoring, incident response, traffic signal optimization, and coordination of events and roadworks, aiming to ensure safe, reliable, and efficient journeys across the region.

proposed scheme plan to achieve this. With these minor adjustments and appropriate coordination, AT and/or ATOC are likely to accept ownership / operation of the signals.

88. It is also important that key collector routes that have to cross land owned by different owners are formed and vested in a way that enables them to readily be connected to and extended by the adjoining owner when they develop their land. If this does not occur there is a real risk the routes will not be formed as planned. To this end road 6 at its eastern end is proposed to be formed at a much higher ground level (approximately 3 metres) than the current ground level at the property boundary. It is recommended that the Applicant provides material on any consultation and agreement with the adjoining owners on the proposed level or else demonstrate that the proposed alignment does not affect the ability to extend the road eastwards. It has been noted that AT considers that road 6 should be a public road but this particularly applies to the short section of it between road 25 and the eastern boundary of the site. This should be earth worked and vested in a way that it can be continued by the adjoining landowner.

STAGING

89. The proposed consent conditions¹¹ enable the applicant to vary the staging of the Centre at its discretion. This therefore also applies to staging provision of the proposed road network.
90. It is important that actual staging does not delay the provision of key connections. A key connection involves roads that enable the routing of buses through the Centre to the station.
91. This relates to the collector roads numbered 25 and 6 and the short extension of road 3 up to the station. Without this link, routes can only access the station via Waihoehoe Road making it difficult to efficiently serve the Centre itself.
92. It is therefore recommended that there be a requirement that this route be provided early on in the development of Stage 2.

FRONTAGE UPGRADES

93. Just beyond the Flanagan Road / Road 3 intersection, the Applicant has development sites identified as Lots H and F, that have frontage to Flanagan Road. It is understood that the Applicant will not be upgrading the frontages of Flanagan Road. The Applicant should undertake the frontage upgrades, including the provision of footpaths and cycle facilities as these are relevant development sites as part of Stage 2. In the absence of these frontage upgrades, there is potential for gaps in the active mode networks, which will create adverse safety and connectivity effects. Policy I450.3 (19) states that there should be a progressive upgrade of existing roads within and adjoining the Drury Centre precinct, including the

¹¹ Subdivision stage 2 condition 3 pages 46-47 of s67 attachment 5 conditions of consent.

upgrade of road frontages to an urban standard at the time of development. To mitigate the adverse effects of this, AT recommends a consent condition that will require the Applicant to provide the necessary frontage upgrades to Flanagan Road.

VEHICLE CROSSINGS

94. The engineering plans indicate vehicle crossings located on Road 13 that provide access to Lot D and Road 1 that provide access to Lot A. These crossings have been designed with increased width to accommodate truck deliveries but directly conflict with an adjacent cycle path. While intended for trucks, AT expects a high number of light vehicles (cars, vans, etc) to use these crossings. Due to their width, smaller delivery vehicles will be able to make this turn into the loading area at speed, increasing the risk of colliding with a cyclist or pedestrian. AT has identified this as having potential adverse safety effects as this will be a hazard for pedestrians and cyclists crossing the vehicle crossings.
95. It is recommended that at the vehicle crossings for both Lots A and D via Road 1 and Road 13 are designed to have mountable kerbs¹². To mitigate this adverse effect, a condition of consent is recommended below to provide mountable kerbs to allow for trucks to enter the loading bay but deter other vehicles from taking the approach at speed. In addition to the mountable kerbs, AT recommends that pedestrian visibility splays are provided on either side of the vehicle crossings to allow for safe intervisibility¹³ between vehicles and active mode users. This has also been conditioned below.
96. AT notes that there is a vehicle crossing proposed from Lot K directly into the signalised intersection of Roads 6 / Road 25 on the eastern side. Even with the red coloured surface treatment to enable safe crossing point for active modes this is still not considered an acceptable outcome from a safety perspective and creates adverse safety effects on the users of the intersection. If the intent is to extend the road eastward from the intersection in the future it should be formed as a fourth leg to the signalised intersection.
97. This is creating adverse effects on the transport network as it enables unsafe traffic movements into a busy signalised intersection. To mitigate this adverse effect, the Applicant should provide a fourth signalised intersection leg at this point, including a signalised active mode crossing. This is reflected in the conditions below, and a 'safe system assessment' should be completed to confirm the safety of its operation.
98. The Applicant has not provided any engineering plans to show the vehicle crossing locations for the lots in relation to the already consented road designs in Drury Metro Centre Stage 1. To ensure all proposed lots have at least one viable access location the Applicant will need to provide plans demonstrating the location of these accesses. This is considered a

¹² Mountable kerbs are low, rounded edges that allow trucks to turn safely while discouraging fast entry by smaller vehicles.

¹³ Intervisibility means ensuring drivers and pedestrians can see each other clearly at crossings.

matter than could be resolved during the Engineering Plan Approval stage, and a consent condition has been recommended to address this.

99. Figure 27 from the ITA shows some of the JOALs in Drury Metro Centre Stage 1 have vehicle crossings intruding into parking bays. This is not acceptable, and the parking bays need to be relocated. This is considered a matter than could be resolved during the Engineering Plan Approval stage, and consent condition has been recommended to address this.

LOADING BAYS

100. Stage 2 development proposes to develop Lots A-K being 10 separate lots. As per the AUP requirements, 19 loading spaces are required subsequently throughout the Stage 2 area. However, only 13 of the 19 loading bays are being provided. Table 7 of the Applicant's ITA provides a break down showing more detail on the individual loading bay requirements per lot. To rationalise the shortfall of loading bays the Applicant recommends that all the Lots and their delivery times will be managed by a body corporate.
101. There is not enough certainty that this will occur in the way the Applicant has anticipated. As such, AT identifies this as having potential adverse effects on the transport network. This is because the shortfall of loading spaces can often lead to delivery vehicles having to park on the road reserve in the berm or blocking a lane if not managed adequately. AT recommends that a condition is provided by the Applicant to set the delivery times to occur outside of typical operating hours for the development site and managed by the body corporates of each lot.

DRAFT CONSTRUCTION TRAFFIC MANAGEMENT PLAN (CTMP)

102. The draft CTMP provides details for the site access locations of construction traffic during the earthworks stage. AT notes that construction traffic will consist of heavy trucks (truck and trailers) and may use up to four different access points to access the site. Most notably the construction traffic will use the intersections of Road 1 / Road 25, Road 1 / Road 3 and Road 1 / Road 2. These intersections have been consented and constructed as part of the Stage 1.
103. AT notes that these roads are not being built to arterial standard as they are collector and local roads. If the intersections are built prior to the earthworks occurring, the Applicant should ensure that no damage is incurred to the intersections or pavement as a result to high volumes of construction traffic. As such, the Applicant is fully liable to reinstate any damage attributable to truck and trailer trips for earthworks. Accordingly, conditions of consent have been recommended to mitigate the potential adverse effects of construction traffic.

COMMENT ON PROPOSED CONDITIONS

104. To assist the Panel, AT provides the following commentary and initial recommendations on the matters that must be addressed by conditions to support any grant of consent as described within this memorandum.
105. AT prefaces these initial comments by noting that it considers that it is somewhat premature to comment comprehensively on the proposed conditions at this stage, given that several of the key transport issues identified in this memorandum require further assessment and response from the Applicant's experts.
106. These initial suggestions are also provided without prejudice to AT's ability to make more comprehensive comments on any draft conditions under section 70 of the Fast-track Approvals Act 2024, should the Panel decide to grant approval.
107. AT recommends that:
 - a. The consented level of land use should not exceed the level of enabled development that can be supported by works underway (rail station, Papakura to Drury six-laning), funded and committed (ultimate Great South Road /Waihoehoe intersection and Waihoehoe road works which are in design and funded), or conditioned as part of a consent (e.g. direct connection).
 - b. Monitoring conditions are imposed, as generally discussed throughout this memorandum, backed by an appropriate section 128 review condition. In relation to the Applicant's existing proposed review condition, condition 92, its wording, while broad, may benefit from amendment to state (without limiting the general power of review) some specific circumstances when a review may be initiated in relation to transport matters. The wording of the advice note would also benefit from review (and probably deletion).
 - c. There may be other options such as timeframes after which consents for stages not delivered lapse, or review conditions around the use or loss of enabled development which can be reassigned.
 - d. The mixes also need to be reviewed to ensure certain land uses and residential in particular are not constrained by any consented mix which is significantly different to those within the standard.
 - e. There needs to be a condition on the applicant to provide the direct connection at an appropriate earlier stage of development. This needs to be determined after further assessment which also takes into the account the commitments towards the ultimate upgrade of Great Road /Waihoehoe Road intersection and Waihoehoe Road.

- f. Following the above, a revised development sequencing table needs to be confirmed which also does not overstate the impact of increased working from home.
- g. A staging requirement to provide a collector road connection (road 25, 6, and 3) through the site to Flanagan Road and rail station capable of accommodating buses.
- h. Additional information and conditions ensuring it is feasible to extend the road 6 collector eastwards.
- i. The existing transport infrastructure upgrade conditions, including condition 85, are reviewed and amended to reflect the matters raised in this report, and the above recommendations. This should include amendments to condition 85 to expressly capture the requirements of I450.6.2(2) of the Precinct, such as:

No dwellings, retail, commercial and/or community floorspace shall be occupied, and no section 224(c) certificate shall be issued and no subdivision survey plan shall be deposited until Prior to the occupation of dwellings, retail, commercial and/or commercial floor space, or the release of section 224(c) certificates for the vacant lots approved in the Stage 1 area, the following transport infrastructure upgrades listed in Column 2 are must be constructed and operational relative to the specified levels of subdivision or development for the activities listed in Column 1. The consent holder must provide appropriate evidence to the Council confirming the infrastructure upgrades listed in Column 2 below are constructed and operational. This condition is imposed on an Augier basis and in terms of section 108AA(1)(a) of the Resource Management Act 1991. ...

It is also noted that condition 85 (which sits in the land use conditions) relates not only to land use, but also subdivision. It needs to be reflected appropriately in the subdivision consent conditions also.

- 108. There also needs to be a general review of all transport-related conditions for accuracy and workability. Merely by way of example, in condition 85, the advice notes appear to be incomplete (e.g. Advice Note 2 does not cross-reference all relevant definitions) and there are errors (incomplete text on Advice Note 3). It is also noted that condition 85 has not be updated to reflect CKL's s67 response.
- 109. The matters summarised above would benefit not only from further assessment by the Applicant's experts, as highlighted in this memorandum, but also from some form of expert conferencing (or similar). In this regard:

- a. It is noted that the current Precinct standards were eventually agreed between Council, Auckland Transport and the applicants after an appeal and mediation process supported by expert conferencing. There has been no similar exercise or collaboration between the applicant and Council/AT ahead of the applicant tabling their (complex) assessment and proposed conditions; and
 - b. It is considered that undertaking such an exercise has the potential to arrive at a consent for stage 2 of the Centre which addresses the issues raised above.
110. In addition to the above key matters, the following section includes additional recommended amendments to draft conditions as well as new conditions recommended by AT. Text in red indicates where amendments are proposed to drafted conditions and also where AT recommends new conditions.

LAND USE CONSENT CONDITIONS

Condition 86. In addition to the transport upgrades in Condition 85 and prior to the occupation of dwellings, or commencement of any activity retail, commercial and/or commercial floor space approved in this consent, the following intersection upgrades must be constructed and operational if they are required to connect the operational activity to the external road network. The consent holder must provide appropriate evidence to the Council confirming the intersection upgrades in (a) – ~~(d)~~ (m) below are constructed and operational:

- a) Signalised intersection between Road 25 and Road 1;
- b) Signalised intersection between Road 3 and Road 1;
- c) Signalised intersection between Road 2 and Road 1;
- d) Signalised intersection between Road 13 and Road 2;
- e) Signalised intersection between Road 13 and 25;
- f) Signalised intersection between Road 11 and 25;
- g) A four-legged signalised intersection between Road 6, Lot K access and Road 25;
- h) Intersection between Road 3 and Flanagan Road;
- i) Upgrade of Flanagan Road (including frontage) to an urban standard from the Flanagan Road / Road 3 intersection to the Designation 6309 boundary;
- j) Upgrade of Flanagan Road frontage along the extent of the Lot F boundary;
- k) Upgrade of Flanagan Road to an urban standard along the extent of the Lot F boundary;
- l) Signalised active modes crossing facility along Lot C vehicle crossing that adjoins Road 25;
- m) Signalised active modes crossing facility along Lot K vehicle crossing that adjoins Road 25 and Road 6.

The transport upgrades specified in (a) to ~~(d)~~ (m) above must be in general accordance with the design details as shown on the approved drawings prepared by Woods and referenced in Condition 1.

New Condition X. Traffic Monitoring and Adaptive Management (Drury Centre Precinct)

- a) Prior to the commencement of any development stage that generates vehicle movements within the Drury Centre Precinct, the consent holder shall prepare and submit a Traffic

Monitoring and Adaptive Management Plan (TMAMP) to the Team Leader – Resource Consents at Auckland Council for certification.

b) The TMAMP shall be prepared by a Suitably Qualified and Experienced Person (SQEP) and shall include the following:

i. Baseline traffic data for the precinct and surrounding transport network, including key intersections and corridors.

ii. Methodology for ongoing traffic monitoring, including:

- Frequency and timing of traffic counts.*
- Locations for data collection.*
- Types of data to be collected (e.g., traffic volumes, intersection performance, mode share).*
- Defined thresholds for acceptable traffic effects, including Level of Service (LoS) criteria and safety performance indicators.*
- Integration with Auckland Transport's Designation 1840 and any other relevant infrastructure upgrades, including the Jesmond to Waihoehoe West FTN corridor.*
- Reporting requirements, including submission of monitoring results to Auckland Council and Auckland Transport at six-monthly intervals.*
- Engagement with relevant stakeholders, including a summary of feedback received and how it has been incorporated.*
- Determining if infrastructure upgrades such as SH1 off ramp, Drury South interchange and Mill Road southern connection are required as a result of the monitoring results.*

c) If monitoring identifies that traffic effects exceed the defined thresholds, the consent holder shall:

i. Prepare a Traffic Effects Mitigation Plan (TEMP) within 20 working days of the exceedance being identified.

ii. The TEMP shall outline proposed mitigation measures, which may include staging adjustments, infrastructure upgrades, or travel demand management strategies.

- iii. *The TEMP shall be submitted to Auckland Council and Auckland Transport for certification prior to the commencement of any further development stages.*
- d) *No further development stages shall commence until the TEMP has been certified and the mitigation measures implemented to the satisfaction of Auckland Council.*

New condition X. Road closure notification

- a) *The consent holder shall notify Auckland Transport in writing of any proposed temporary road closures or restrictions within or adjacent to the Drury Centre Precinct at least 20 working days prior to the intended closure date. The notification shall include:*
 - i. *The location and extent of the proposed closure or restriction.*
 - ii. *The proposed duration and timing of the closure.*
 - iii. *The reason for the closure.*
 - iv. *A copy of the proposed Traffic Management Plan (TMP) prepared by a Suitably Qualified and Experienced Person (SQEP) in accordance with the Code of Practice for Temporary Traffic Management (CoPTTM) or any replacement standard.*
- b) *The consent holder shall ensure that:*
 - i. *The TMP is implemented in full for the duration of the closure.*
 - ii. *Safe and efficient access is maintained for all road users, including pedestrians, cyclists, public transport, and emergency services.*
 - iii. *Any changes to the TMP are communicated to Auckland Transport immediately.*
- c) *No road closure shall commence until Auckland Transport has acknowledged receipt of the notification and TMP.*

New Condition X. Transport Infrastructure Upgrades

- x. *The consent holder must provide the following transport infrastructure prior to occupation of the dwellings/units and at the expense of the consent holder:*
 - a) *Signalised intersection between Road 25 and Road 1;*
 - b) *Signalised intersection between Road 3 and Road 1;*
 - c) *Signalised intersection between Road 2 and Road 1;*

- d) Signalised intersection between Road 13 and Road 2;*
- e) Signalised intersection between Road 13 and 25;*
- f) Signalised intersection between Road 11 and 25;*
- g) A four-legged signalised intersection between Road 6, Lot K access and Road 25;*
- h) Intersection between Road 3/Flanagan Road;*
- i) Upgrade of Flanagan Road (including frontage) to an urban standard from the Flanagan Road / Road 3 intersection to the Designation 6309 boundary;*
- j) Upgrade of Flanagan Road frontage along the extent of the Lot F boundary;*
- k) Upgrade of Flanagan Road to an urban standard along the extent of the Lot F boundary;*
- l) Signalised active modes crossing facility along Lot C vehicle crossing that adjoins Road 25.*
- m) Signalised active modes crossing facility along Lot K vehicle crossing that adjoins Road 25 and Road 6.*

New Condition x. Delivery Hours and Ongoing Management

- a) To minimise potential adverse effects on traffic, amenity, and safety within the Drury Centre Precinct, the consent holder shall ensure that all deliveries to commercial and mixed-use activities occur outside of typical operating hours, defined as:

 - i. Weekdays: 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM,*
 - ii. Weekends and public holidays: 9:00 AM to 5:00 PM.**
- b) The consent holder shall include delivery timing restrictions in all lease agreements or operational plans associated with the development.*
- c) Ongoing delivery operations, including scheduling, access control, and compliance with delivery hour restrictions, shall be managed by the Body Corporate or equivalent management entity for each lot or development stage.*
- d) The Body Corporate shall maintain a record of delivery schedules and any complaints or incidents related to delivery operations and shall make this information available to Auckland Council upon request.*

New Condition X. Safe System Audits

x. The consent holder must carry out a Stage 3 (Detailed Design) Road Safety Audit of the following proposed intersection upgrades:

- a) Signalised intersection between Road 25 and Road 1;*
- b) Signalised intersection between Road 3 and Road 1;*
- c) Signalised intersection between Road 2 and Road 1;*
- d) Signalised intersection between Road 13 and Road 2;*
- e) Signalised intersection between Road 13 and 25;*
- f) Signalised intersection between Road 11 and 25;*
- g) Signalised intersection between Road 6, Lot K and Road 25; and*
- h) Intersection between Road 3 and Flanagan Road*

These are to be carried out in accordance with the New Zealand Transport Agency Procedure Manual by an independent and appropriately qualified safety auditor. The Road Safety Audits Report shall be provided to Council prior to the commencement of the activity. Any recommendations raised in the audit report shall be implemented to the satisfaction of Auckland Council and can be submitted as part of the Engineering Plan Approval application.

New Condition X. Pedestrian Visibility Splays

x. A pedestrian visibility splay of 2m x 2.5m (2m along the property boundary) must be provided on both sides of the proposed retail / commercial vehicle crossings located on Road 13 serving Lot D. Any obstructions including boundary fencing and/or landscaping within the visibility splay areas must not exceed 900mm in height. If fencing is provided above 900mm height stipulation it must be at least 80% visually permeable. Landscaping in the visibility splay area must be trimmed and maintained in perpetuity to comply with the stipulated height by the consent holder.

x. A pedestrian visibility splay of 2m x 2.5m (2m along the property boundary) must be provided on both sides of the proposed retail / commercial vehicle crossing located on Road 1 serving Lot A. Any obstructions including boundary fencing and/or landscaping within the visibility splay areas must not exceed 900mm in height. If fencing is provided above 900mm height stipulation it must

be at least 80% visually permeable. Landscaping in the visibility splay area must be trimmed and maintained in perpetuity to comply with the stipulated height by the consent holder.

New Condition X. Crossings and Footpaths

x. All new vehicle crossings must be designed and formed to Auckland Transport's design standards. This must be undertaken at the consent holder's expense and in consultation with Auckland Transport.

Advice note:

The consent holder must locate all existing services (water, wastewater, stormwater, power, gas and telecommunications) proposed to be reinstated on the subdivision site that may be affected by the proposed construction work and notify the owners of the services of the construction work prior to the commencement of work on site. Any work necessary for the protection or relocation of services shall be undertaken at the consent holder's expense and in accordance with the requirements of the Auckland Council (water and wastewater – Waste and Wastewater Code of Practice for Land Development and Subdivision, stormwater – Auckland Council Code of Practice for Land Development and Subdivision and the relevant utility operator responsible for the power, gas and telecommunication services).

New Condition X. Avoid Damaging Assets

x. Unless specifically provided for by this consent approval, there must be no damage to public roads, footpaths, berms, kerbs, drains, reserves or other public asset as a result of the earthworks and construction activity. In the event that such damage does occur, the Council will be notified within 24 hours of its discovery. The costs of rectifying such damage and restoring the asset to its original condition must be met by the consent holder.

New Condition X. Raised Vehicle Accessways Lot A

x. The consent holder must raise designated sections of the pavement within the eastern and western commercial vehicle crossings adjoining Road 1. This is required to encourage passenger

vehicle to track along the centre of these vehicle crossings. The raised pavement must effectively deter passenger vehicles from tracking over this section of vehicle crossing, which is designed for truck manoeuvring. All raised sections must be painted with yellow cross hatched lines to the satisfaction of Council. The painting, height and steepness of the raised pavement must also be to the satisfaction of Council.

New Condition X. Raised Vehicle Accessways Lot D

x. The consent holder must raise designated sections of the pavement within the eastern and western commercial vehicle crossings adjoining Road 13. This is required to encourage passenger vehicle to track along the centre of these vehicle crossings. The raised pavement must effectively deter passenger vehicles from tracking over this section of vehicle crossing, which is designed for truck manoeuvring. All raised sections must be painted with yellow cross hatched lines to the satisfaction of Council. The painting, height and steepness of the raised pavement must also be to the satisfaction of Council.

SUBDIVISION CONDITIONS

Conditions requiring that:

- Collector Roads 6 and the portion of road 3 between it and Flanagan Road must be vested as public roads.
- The public road reserves at the intersection of private and public vested roads must include all infrastructure required for the operation of the intersection.

Engineering Approval – Transport

~~*39. At Engineering Plan Approval stage, the consent holder must submit detailed roading plans for approval by the Council. In particular, the plans and accompanying documentation must incorporate the following features and alterations: Prior to the commencement of any engineering works, the consent holder must submit engineering plans (including engineering calculations and specifications) to the Council for approval in writing. The engineering plans must include, but not be limited to, the information regarding the detailed design of all roads and road network activities provided for by this*~~

resource consent approval. In particular, the detailed design of the following should be provided:

- i. Intersections which comply with the TDM's Urban and Rural Urban and Rural Roadway Design V1 part of the Engineering Code, Table 2/3, except where Auckland Transport has approved any departures; ~~and~~*
- ii. Further traffic calming measures for Roads 3, 11 and 13, which may include raised table crossings where mid-block sections between the intersections are too long and where pedestrian links shown in the Integrated Transportation Assessment meet the local roads-; ~~and~~*
- iii. All new roads and upgrades to existing roads;*
- iv. Flanagan Road frontage upgrades;*
- v. All shared user paths through the Stage 2 development;*
- vi. All new bus stop infrastructure;*
- vii. All new active modes crossings facilities;*
- viii. All new turning heads must be designed and formed to Auckland Transport's standards;*
- ix. All new vehicle crossings; and*
- x. All new on-street car parking bays.*

x. As part of the application for Engineering Plan Approval, a registered engineer must:

- a) Certify that all public roads and associated structures/facilities or access ways have been designed in accordance with Auckland Transport's Transport Design Manual.*
- b) Provide a statement that the proposed infrastructure has been designed for the long-term operation and maintenance of the asset.*
- c) Confirm that all practical measures are included in the design to facilitate safe working conditions in and around the asset.*

Advice Notes:

If the Engineering Plan Application (EPA) drawings require any permanent traffic or parking restrictions, the consent holder must submit a resolution report for approval by Auckland Transport Traffic Control Committee to legalise these restrictions. The resolutions, prepared by a qualified traffic engineer, will need to be approved so that the changes to the road reserve can be legally implemented and enforced.

The resolution process required external consultation to be undertaken in accordance with Auckland Transport's standard procedures. It is the responsibility of the consent holder to prepare and submit a permanent Traffic and Parking Changes report to Auckland Transport Traffic Control Committee (TCC) for review and approval. A copy of the resolution from Traffic Control Committee must be submitted to Council prior to applying for a certificate under section 224(c) of the RMA.

The engineering plan application forms including fees can be found at the following Auckland Council website:

<https://www.aucklandcouncil.govt.nz/building-and-consents/engineering-approvals/Pages/default.aspx>

Advice Notes:

Vehicle Crossing Approval

x. The consent holder must obtain vehicle crossing approval from Auckland Transport for the proposed vehicle crossings. Please visit <https://at.govt.nz/about-us/working-on-the-road/vehicle-crossing-application> for more information.

Corridor Access Requests

x. The consent holder will need to obtain a Corridor Access Request approval from Auckland Transport for the proposed works in or occupation of the road reserve.

It will be the responsibility of the consent holder to determine the presence of any underground services that may be affected by the consent holders work in the road

reserve. Should any services exist, the consent holder must contact the owners of those and agree on the service owner's future access for maintenance and upgrades. Services information may be obtained from <https://www.beforeudig.co.nz/>.

All work in the road reserve must be carried out in accordance with the general requirements of the National Code of Practice for Utility Operators' Access to Transport Corridors <https://nzuaq.org.nz/wp-content/uploads/2018/11/National-Code-amended-version-29-Nov-2018.pdf> and Auckland Transport Design Manual <https://at.govt.nz/about-us/manuals-guidelines/transport-design-manual/>

Prior to carrying out any work in the road corridor, the consent holder must submit to Auckland Transport a Corridor Access Request (CAR) and temporary Traffic management plan (TMP), the latter prepared by an NZ Transport Agency qualified person and work must not commence until such a time as the consent holder has approval in the form of a Works Access Permit (WAP). The application may be made at <https://at.govt.nz/about-us/working-on-the-road/corridor-access-requests> and 15 working days should be allowed for approval.

New Advice note x. Works that require a Resolution

x. The following requires resolution approval from Auckland Transport:

- i. Proposed No Stopping At All Times line markings (NSAAT); and
- ii. Proposed bus stop markings.

Advice Note:

Permanent traffic and parking controls as per condition (x) above are subject to a Resolution approval from Auckland Transport. Changes to traffic/parking controls on the road reserve will require Auckland Transport Traffic Control Committee resolutions. The resolutions, prepared by a qualified traffic engineer, will need to be approved so that the changes to the road reserve can be legally implemented and enforced. The resolution process requires external consultation to be

undertaken in accordance with Auckland Transport's standard procedures. It is the responsibility of the consent holder to prepare and submit a permanent Traffic and Parking Changes report to Auckland Transport Traffic Control Committee for review and approval. No changes to the traffic and parking controls will be allowed before the resolution is approved by the Auckland Transport Traffic Control Committee. All costs must be borne by the consent holder. Application details can be found from the following Auckland Transport website link:

<https://at.govt.nz/about-us/working-with-at/traffic-and-parking-controls>

- x. A copy of the Resolution from the Traffic Control Committee must be submitted to the Council prior to the commencement of the activity provided for by this consent approval.*

1. Supporting Documents

Attachment 1 – Roading layout

