

To: Drury Metropolitan Centre Consolidated Stages 1 and 2 Expert Panel

From: Mary Wong / Pamela Santos – Barker & Associates Limited

Date: 19 September 2025

Re: Response to s67 matters from the Expert Panel

This memorandum addresses the Expert Panel’s ‘Section 67 matters’ request dated 5 September 2025 (“s67 matters”) regarding the Drury Metropolitan Centre Consolidated Stages 1 and 2 listed project (“the Project”).

Kiwi Property’s responses to the individual information requests by the Panel are contained in the table overleaf. This table consolidates responses from the project team relative to their respective disciplines. The following are also included as supporting attachments:

- Attachment 1 – Urban Design response prepared by B&A
- Attachment 2 – Revised and additional Landscape Plans prepared by Boffa Miskell
- Attachment 3 – Updated Proposed Draft Consent Conditions
- Attachment 4 – Transport response prepared by Hughes Traffic & Transportation
- Attachment 5 – Draft Drury Centre Waste Management Plan
- Attachment 6 – Revised¹ Engineering Plans prepared by Woods
- Attachment 7 – Revised Architectural Plans prepared by Ignite
- Attachment 8 – Stormwater response prepared by Woods
- Attachment 9 – Site Management Plan prepared by Engeo

To assist the Panel, we note that the revised engineering plans by Woods in Attachment 6 include:

- (a) The addition of a pedestrian refuge island on the road 3 arm of the Flanagan Road / Road 3 roundabout; and
- (b) The addition a signalised crossing point on Road 6 between Lot 39 (Building H1) and Lot 37 (Building G1).

These changes have been carried over to the landscape plans in Attachment 2 and the architectural plans in Attachment 7 for consistency.

¹ We note that the entire engineering plan package has been issued for completeness but refer to sheets P24-447-01-2000-RD, P24-447-01-2004-RD, P24-447-01-2053-RD, P24-447-01-2507-RD and P24-447-01-2511-RD for the relevant updates.

Memorandum

No. Section 67 Information Request

Applicant Response

Open Space

1	(a) Overall open space provision It is noted that Precinct Plan 2 identifies a requirement for three areas of open space within the relevant area of the Drury Centre Precinct, being Homestead Park, a Town Square, as well as Valley Park (and a fourth area south of Pitt Road, as incorporated within the previous Stage 1 approval), in addition to the open space alongside Hingaia Stream. The Panel acknowledges the comments at section 11.4.3.17 of the AEE with respect to Policy I450.3(15). However, we note that this policy also references the requirements of Policy E38.3(18) which requires that the open space be provided “in proportion to the future density of the neighbourhood”, and criterion I450.8.2(2)(d) and (e) includes similar provisions. The Panel therefore requests further explanation of the way in which the proposed open space areas will be in accordance with what is anticipated within the Precinct and the AUP.	Refer Urban Design response in Attachment 1 .
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(b) Valley Park Further to the question of overall open space provision at (a) above, the Panel notes that Valley Park is proposed to be comprised of an area of formed pedestrian space and steps on the western side, but is otherwise limited to narrow sections with pathways around and between a wetland area and Stream A. Please provide further comment on the way in which Valley Park open space will function as an appropriately-scaled area of civic plaza.	
(c) Plan key The colour and key of various areas shown on Drawing 00-1201 does not reference footpaths, pedestrian areas or the aforementioned 'plaza' areas (shown in cross-hatch). It would be of assistance if these areas were included so that the expectations as to the use of these areas were more clearly articulated (and align with the different surface treatments indicated in the Landscape Concept Plan). Please also confirm the meaning of the white dots shown on the Landscape Concept Plan and whether these depict secondary pathways (and envisage small bridging structures across the stream).	An updated Landscape Masterplan is included as Attachment 2 of this response. This updated Landscape Masterplan includes an updated 'Legend' which better shows the footpaths, pedestrian areas and plaza areas proposed within this part of the Drury Centre Precinct. The white dots illustrated on the Landscape Concept Plan indicate the proposed inclusion of informal pathways that gently meander through the planted riparian zone. These pathways are intended to enhance recreational opportunities within the precinct, offering moments of exploration and connection with the natural environment, right in the heart of a Metropolitan Centre. The pathways are envisioned to be constructed using informal, permeable materials such as hoggins, gravel, or other suitable surfaces that complement the landscape character. Where stream crossings are necessary, they are intended to be low-impact and understated, such as stepping stones, rather than formal bridging structures. Any crossing elements will be carefully designed to respect the environmental sensitivities and functional requirements of the stream.

(d) Road 6 connection A further pathway/pedestrian area is depicted on the northern side of Road 6, adjacent to Building H1. Please confirm the way in which safe pedestrian access will be provided for between these two pedestrian environments across Road 6, which are currently shown as offset from each other with no pedestrian crossing connecting them.	To facilitate safe pedestrian access between these two pedestrian environments, a signalised crossing point is now added on Road 6 between Lot 39 (Building H1) and Lot 37 (Building G1). This is reflected on the updated engineering plans in Attachment 6 of this response.
(e) Access and maintenance The Panel understands from the Applicant's response of 28 August 2025 that no formal easements or other instruments are proposed to ensure public access to the open space areas is secured into the future, nor how the area will be maintained. The Panel draws attention to the latter aspect arising under the relevant Precinct provisions at I450.8.2(2)(g) and seeks clarification as to how this will be formalised and provided for in an enduring way in accordance with the Precinct requirements. Footnote: Beyond the five year landscape maintenance obligations proposed by Conditions 26(h), 32 and 59, but possibly intended in perpetuity via Conditions 39(c) and 41(e)	Assessment criteria I450.8.2(2)(g) relates to the development of publicly accessible open spaces greater than 1,000m² and specifies (our underlined emphasis added) <i>"If private ownership of publicly accessible open space is proposed, whether appropriate arrangements are proposed to provide for <u>on-going private maintenance</u>."</i> The privately owned and publicly accessible open spaces proposed in this project relates to Hingaia Reserve (Lot 600 and Lot 609) and Valley Park (Lots 601 602, 603 and 604). These open spaces will be privately owned by Kiwi Property and are also intended to be maintained by Kiwi Property for entire period of this ownership structure where they act as public open spaces, beyond the <i>minimum</i> 5 year maintenance period. It is considered that imposing a consent notice on the relevant lots would be appropriate to ensure this on-going private maintenance is achieved. Accordingly, condition 40A is included in the proposed subdivision consent conditions to achieve this.

10	(f) Development contributions The Panel wishes to understand whether, irrespective of the extent of open space to be provided (which is not to be vested), the Applicant will be subject to and accept the imposition of development contributions that incorporate an open space component (in full or in part) - i.e., that the Applicant will not seek a reduction or off-set for the proposed privately-owned open space that will be provided for by the present application. Footnote: With reference to the Applicant Response Table at [1.4] and [4.1], and the Memorandum of Counsel dated 28 August 2025, at [53(f)(v)]	Kiwi Property confirms that this project will be subject to and accepts the imposition of development contributions that incorporate an open space component based on the applicable development contribution policy (i.e. Development Contributions Policy 2022 – Variation A). Kiwi Property has no intention of seeking a reduction or offset for the privately owned open space in this application.
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Open Space Zoning

2	The Panel also seeks to understand the reasons for the difference in the proposed zoning at the south-west corner of Stage 2.3. The Panel observes that Lot 102 for the earlier Drury Centre consent was amended to provide for a common zoning, in recognition of administrative inefficiencies associated with an area being subject to two different Open Space zones.	The Stage 1 fast-track consent did not provide for any changes to the Open Space zoning. The zoning of the Drury Centre Precinct was confirmed as part of Plan Change 48 and there have been no changes to the zoning of land within this precinct since then. Lot 102 in the Stage 1 fast-track consent for Drury Centre represents the 20m wide esplanade reserve adjacent to the Hingaia Stream which is to be vested with Council. There is no difference in the proposed zoning at the south-west corner of Stage 2.3. We assume that the Panel is referring to the dark green and light green shading on the scheme plan for Stage 2.3 whereby Lot 610 is shaded dark green and Lots 609-610 are shaded light green. These different shades of green do not represent any difference in zoning proposed in this application which will remain as the current zoning of Open Space – Informal Recreation. The dark green shading of Lot
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		610 simply represents the esplanade reserve which will be vested with Council (and therefore public) and the light green shading over Lots 609-610 represents the intention for this land to function as public open space also but will be privately owned.
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Billboards

3	The Panel notes that the proposal incorporates two large LED billboards (15 x 6m each). However, no application has been sought under Rule E23.4.1(A24) for these billboards (as a restricted discretionary activity). The Panel is not clear whether these are assumed by the Applicant to be part of 'comprehensive development signage'. If so, please address the proposition that these should be considered as separate activities within E23.4.1 and E23.4.2. We make the following further comments in respect of the billboards and relevant proposed conditions: (a) The AEE at 6.2.1 comments: <i>"Any backlit or illuminated signs will be designed and installed to comply with the relevant permitted activity standards in Chapter E24 Lighting of the AUP and a condition of consent with respect to signage and lighting is proposed to that effect"</i>.	The scope of the project does not include provision for any billboards and therefore no application has been sought under rule E23.4.1(A24) as it relates to restricted discretionary consent for billboards in the Metropolitan Centre zone. The larger digital signs in the project referenced in the retail signage key as 'Signage Type G – LED screen' and shown on Ignite drawing number 00-7402 are considered to be 'comprehensive development signage' and therefore consent has been sought under rule E23.4.2(A53). 'Billboard' is defined in the AUP as (our underlined emphasis added): <i>Any sign, message or notice conveyed using any visual media which is used to advertise any business, service, good, products, activities or events <u>that are not directly related to the primary use or activities occurring on the site of the sign.</u></i> <i>Includes:</i> <i>• the sign and any associated frame and supporting device, whether permanent, temporary or moveable, whose principal function is to support the message or the notice.</i> <i>Excludes:</i> <i>• stencil signage or similar markings;</i> <i>• a poster or poster signage as defined in the Auckland Transport, Auckland Council Signage Bylaw 2015;</i> <i>• a banner or flag situated on or over a road or public place;</i>
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However, the relevant condition (at 30) is noted to not relate to billboard signage under Chapter E23, only to lighting generally. (b) The effect of the billboards has been addressed in the CKL letter of 17 July 2025, but this only addresses the traffic-related assessment criteria at E23.8.2(2)(b) and (c). Please address the application of the standards at E23.6.1(3)-(19) and provide an assessment against E23.8.1, as well as other parts of E23.8.2(1), (2)(a) and (d), (3) and (4). A particular matter that warrants consideration and response is that the southern billboard is proposed to be located diagonally opposite a residential area (R12), where night-time illuminance levels may require further control beyond the standards of E23.6.1. (c) The proposed curved LED screens have been relied upon to define their respective building corners. Please explain how this is considered to be a desirable urban design approach, noting their position adjacent to key entry points into this Stage 2 precinct. The Panel notes the comment in the Urban Design Assessment (section 5.8) in respect of the billboards, but wishes to understand the reasoning behind the proposal to use billboards in lieu of well-designed and articulated building elevations or architectural features in such prominent locations.	• <i>real estate signage or directional real estate signage;</i> • <i>vehicle signage as defined in the Auckland Transport, Auckland Council Signage Bylaw 2015;</i> • <i>community event signage as defined in the Auckland Transport, Auckland Council Signage Bylaw 2015;</i> • <i>regional and major event signage defined in the Auckland Transport, Auckland Council Signage Bylaw 2015;</i> • <i>any election sign as defined and controlled by the Auckland Transport Election Signs Bylaw 2013.</i> The definition of ‘Comprehensive development signage’ in the AUP has the same meaning or definition as given in the Auckland Transport, Auckland Council Signage Bylaw 2015. That definition under the Signage Bylaw is: <i>means signage relating to a new building or the alteration of an existing building where the building or alteration requires a resource consent and/or building work to the value of at least \$100,000, assessed at the time a building consent application is lodged with the council.</i> The signage Type G will convey visual media that <u>is directly related to</u> the primary use of activities occurring on the site of the sign (i.e. it will be directly related to the use and activities within Drury Centre). This means it does not fall within the definition of a billboard in the AUP which applies where the visual media displayed <u>is not</u> directly related to primary use or activities on the site of the sign (i.e. third party advertising). As signage Type G is not a ‘billboard’ by definition under the AUP, the rules in table E23.4.1 (which apply to billboards only) do not apply. Signage Type G is considered to be ‘comprehensive development signage’ because they relate to the new buildings to which they will be attached to which requires resource consent and the building work value exceeds \$100,000. Therefore, signage Type G has been assessed in table E23.4.2(A53) as a restricted discretionary activity.
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	We have clarified above that the project does not involve any billboards. However, for completeness, we respond to the further comments of the Panel. (a) Condition 30 relates to signage and specifically those as shown on the Ignite drawings and referenced in Condition 1 (if consent is approved). The project does not involve any billboards and therefore no conditions related to billboards have been included. However, it is acknowledged that there is a disconnect between that passage identified by the Panel in section 6.2.1 of the AEE regarding lighting and Condition 30 because the current wording of Condition 30 does not include the requirement for lighting details to be provided. It is agreed that lighting details are important information for any illuminated signs and this must be provided to Council for certification prior to installation. Accordingly, Condition 30 and 83 in the revised conditions provided at Attachment 3 have been updated to include lighting information for signage. (b) The CKL letter dated 17 July 2025 (July CKL Letter) does not address billboards. Page 1 of the CKL letter specifically states that the report excludes any signage (e.g. billboard) that advertises products or services not directly related to activities in the Centre for which a separate consent is needed. Standards E23.6.1(3)-(19) all relate to billboards. As the project does not include any billboards, an assessment against these standards is considered to be unnecessary. The July CKL letter provides an assessment of the potential lighting, traffic and pedestrian safety effects associated with the two larger Type G digital signs. That assessment concludes these signs will comply with Tables 2.1 and 2.2 of Australian Standards AS 4282 - 1997 (Control of the Obtrusive Effects of Outdoor Lighting) referred to in assessment criteria E23.8.2(2)(b) and provides recommendations for the digital displays to ensure any adverse lighting, traffic and pedestrian safety effects are appropriately avoided or mitigated to be less than minor. Those recommendations are generally consistent with the design requirements of the Signage Bylaw 2015 for 'Changeable message signage' and 'Static illuminated signage'. On this basis, we have converted those recommendations from CKL into proposed conditions of consent for Signage Type G and this is reflected in the revised conditions as Condition 30A, 30B and 30C provided at Attachment 3.
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		In relation to potential visual amenity effects on the scale and location of these LED digital signs, we consider these to be appropriate in a business environment and a common feature of the Metropolitan Centre zone which provides for all scales of commercial activity and associated signage. These two digital signs on the buildings within Lots B and D respectively will be integrated with the relative building form and shape in terms of its curved nature wrapping around the respective building corners, while also performing an architectural feature function too (further assessed in response to (c) below). The Ignite drawings also demonstrate that these digital signs will be physically separated from, and distinguished in terms of its size and design of all other static/non digital signs proposed on the surrounding buildings, such that these digital signs in combination with others proposed in Drury Centre will not give rise to adverse visual clutter or cumulative effects. We do not consider that it is necessary to impose a limitation on the duration of consent due to future land use and/or transport network changes. Drury Centre is a new metropolitan centre developed by Kiwi Property and there are unlikely to be significant new land uses or transport network changes beyond those proposed in this application or anticipated by way of transport infrastructure upgrades to support subdivision and development in the precinct. Therefore, it is considered that the digital signs will be appropriate from a site development and traffic safety perspective. With respect to the digital sign on Lot B located diagonally opposite a future residential area (R12), it is considered that proposed Conditions 30B and 30C will ensure that night-time illuminance levels are appropriate. Overall, it is considered that the scale and location of the signage will be visually appropriate for this environment and will not detract from amenity values, maintaining the character anticipated in this zone or precinct. (c) Refer Urban Design response in Attachment 1.
Lot C connection		

4	The Panel notes the amendment to Lot C in response to the Council's urban design recommendation to include a pedestrian connection within the site from the south. The Panel also seeks consideration of an option for an improved alignment to this lot from the secondary pedestrian connection from the west (within Lot B) to Te Hononga Road, so that the internal pedestrian connection can be extended eastwards in a more logical alignment in terms of its lead-up to a relocated building entrance within Lot C (i.e., instead of the staggered pedestrian link that currently results from the offset pedestrian connection through the carpark from Te Hononga Road). If an alternative option is not presented, the Panel suggests an explanation as to how the current proposal is consistent with the outcomes suggested at section 5.7 of the Urban Design Assessment that: <i>The built form, although setback is orientated towards Te Hononga Road and Rauika Road with windows which face the streets. The entranceway is a key feature within the façade, highlighted through modulation and material changes within the built form. <u>It is also designed to directly link to Te Hononga Road through a direct pedestrian crossing within the carpark. This creates convenient access to the front entrance while also aligning with the</u></i>	Refer Urban Design response in Attachment 1. In relation to the clarification sought about the large street tree on the eastern side of Te Hononga Road, the Landscape Masterplan has been updated to remove the proposed large tree and provide a pedestrian connection along the southern edge of the stormwater gully area between Lot K, providing an uninterrupted pedestrian connection to the adjoining property boundary at existing ground level.
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<u>pedestrian accessway, located within Block B across the Te Hononga Road. This creates a strong visual connection between the two blocks. (emphasis added)</u> The Panel also seeks confirmation of its understanding that the large street tree proposed to be located on the eastern side of Te Hononga Road (shown in the Landscape Concept Plan) would interrupt this connection and (if so) an alternative option to address this issue.	
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Transport

5	(a) Figures clearly showing external traffic movements to and from the site (entering and exiting) for both the previous and proposed scenarios, especially as between the 2,000vph and 3,800vph trigger levels. This is to determine if the change in mix in use (residential vs commercial) has any notable change in direction of traffic.	Refer Transport response in Attachment 4 .
	(b) The SATURN modelling in the 26 August 2025 response (page 12) appears to show a new road connecting Bremner Road to Waihoehoe Road (essentially replacing Norrie Road which has an existing one-lane bridge). This route is being used as an alternative traffic route should the SH1DC link not be included. Please comment on the appropriateness of this road being	Refer Transport response in Attachment 4 .

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	included (as while it has been designated, it is not understood to be funded).	
	(c) Further to (b) above, should this road not be constructed (and the Norrie Road one-lane bridge be retained), can please assess / provide traffic volume diagrams as to where this traffic would be deviated to, given the one-lane bridge constraint (e.g., would it be to Great South Road).	Refer Transport response in Attachment 4 .
	(d) The Sidra outputs (page 11 of the transportation response) show LOS F operation with over 5 minutes delay for a number of movements. This is not typically considered acceptable; however, it appears this is based on the previous network performance “criteria” of the original Plan Change 48 relating to average queue lengths. As such: i. Please comment further on how this intersection / surrounding area will operate safely with this level of delay; and ii. Please provide the same SIDRA output with 95%ile queues shown, rather than average queues.	Refer Transport response in Attachment 4 .
	(e) The Sidra output on page 11 and Sidra output on page 14 show modelling of the same intersection, with increased traffic due to a	Refer Transport response in Attachment 4 .

	step in the Precinct upgrade table (i.e., 2,000vph to 3,800vph). It is noted that the intersection appears to operate better with increased traffic, which is unusual. Please comment further on why this occurs and in particular: i. Have the same inputs been used in both the SIDRA analysis including cycle time; and ii. Has anything other than traffic volumes been altered in the SIDRA analysis.	
	(f) For the existing (base), 2,000vph and 3,800vph trigger levels, please provide: i. SATURN turning volume plots at the SH1 interchange and at the Waihoehoe Road / Great South Road intersection; ii. Sidra movement summaries for the two intersections detailed above; and iii. The above (i and ii) with and without the SH1DC link.	Refer Transport response in Attachment 4.
	(g) Please provide a review of the Flanagan Road / Road 3 Proposed Roundabout in relation to pedestrian provision. In particular, please comment in respect of the southern leg (Road	Refer Transport response in Attachment 4. A pedestrian refuge island on the road 3 arm of the Flanagan Road / Road 3 roundabout has now been included to enhance pedestrian safety.

	3) and if changes are required, do they change the bus tracking?	
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Waste Management Plan

6	Condition 28 relates to the provision of a Waste Management Plan, but does not include an objective for this plan, nor is a draft version of that plan yet before the Panel. The Applicant's transportation assessments have also not considered this matter beyond an analysis of the proposed loading space shortfalls. Please provide a draft WMP including appropriately sized and located areas for waste storage and collection. We draw the Applicant's attention to the matters of discretion for the Metropolitan Centres and Mixed Use zones which require consideration of "the adequacy of access for service vehicles (including waste collection)" (refer H9.8.1(1)(c) and H13.8.1(1)(c)).	A draft Waste Management Plan (WMP) has been prepared for Drury Centre and this is provided as Attachment 5. This draft WMP does not show the size and location of areas for waste collection and storage because these details are typically shown on the architectural plans instead. These details will be determined in the next preliminary and/or detailed design phases of the project. Accordingly, Condition 24 Final Architectural Design Plans – Materials and Finishes has been updated to require the location and size of areas for waste storage and collection to be provided. Condition 28 (Waste Management Plan) has also been updated in the proposed conditions to require a "final" version to be provided The updates have been reflected in the proposed conditions at Attachment 3.
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Stormwater

7	Following an initial review by the Panel's stormwater expert, the following information is requested:	Refer Stormwater response in Attachment 8. In summary, this response confirms that the proposed stormwater pipes and any other parts of the proposed stormwater infrastructure in Stage 2 have been designed for flow originating from outside Stage 2 with respect to future land use assumptions as per the SWCOP. Therefore, in terms of
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	(a) Drawing no.P24-447-01-3200DR shows the Stage 2 catchment boundary along the eastern side of Lot 42, however there is a blue arrow indicating runoff from a contributing catchment outside the Stage 2 area, flowing in a westerly direction towards Wetland 2-1. Please advise if the proposed stormwater pipes and any other parts of the proposed stormwater infrastructure in Stage 2 have been designed for flow originating from outside Stage 2 and how this is addressed with respect to future land use assumptions in assessing runoff and relevant consent conditions.	relevant consent conditions, it is considered that Condition 1 Activity in Accordance with Application (Land Use Consent) and Condition 4 Stormwater Network (Stormwater Discharge Permit) are appropriate as they require the project to be developed in accordance with the reports and plans provided with the application and the piped stormwater network to be designed and constructed with the SWCOP.
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Site levels

8	Please confirm the datum used for the hydrographs within the Stormwater Assessment Report (Attachment 13), and in particular for Figure 35 so that these may be related to the RL levels shown in the architectural plans. This is to allow an understanding of the expected freeboards for the ground floor of Building H2 in Lot 40, as relevant to proposed Condition 80A.	The datum used for the flood model is AVD1946 and the RLs of the architectural plans are shown as NZVD2016. The conversion will require the flood levels to be <i>lowered</i> by 280mm as NZVD2016 is 280mm less than AVD1946 at this site. The FFLs of Building H2 on Lot 40 is to be designed in accordance with proposed consent Condition 80A which requires a minimum 500mm freeboard above 100-year flood level. It is noted that current FFLs shown in the architectural plans for Building H2 do not achieve the minimum 500mm freeboard above the flood level (i.e., indicated to be below the flood level). However, this is to be incorporated during the detailed design phase when the culvert(s) are operational which will then determine the relevant flood level and minimum freeboard required thereafter.
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Conditions

9	(a) Management Plans The conditions related to management plans all include 'Objective' statements to inform the purpose of the plans. The exception is for the Chemical Treatment Management Plan (ChTMP) at Condition 32, and the Applicant is invited to include provision for such a statement in an updated version. Presumably Condition 32 would require a 'final' ChTMP, based on that which has been provided as Appendix 25C to the application.	We agree that it would be sensible to include an objective statement for the ChTMP in Condition 32 consistent with the approach of all other management plan conditions. This has now been added in the revised proposed conditions in Attachment 3. We also confirm that Condition 32 should refer to a 'final' ChTMP and this is now reflected in the revised proposed conditions. In undertaking this exercise, we have also noted that Condition 28 Waste Management Plan does not include an objective statement. For consistency, we have now added an objective statement for this management plan also. This has now been added in the revised proposed conditions in Attachment 3.
	(b) Land use conditions Condition 85: Please clarify the reference (relevance) to s.176 (designation issue) under Advice Note 3.	Some of the transport upgrades listed in Column 2 of Condition 85 are subject to designations in the AUP which provide for those transport infrastructure projects (i.e. Ultimate Waihoehoe Road upgrade and Drury Central Rail Station). Therefore, the purpose and relevance of referring to the s176 RMA process in Advice Note 3 was to advise the consent holder that any works within designated land would need to follow the process specified in s176(1)(b) of the RMA and that this process is separate from any Corridor Access Request from AT for any works within the road corridor. To avoid any confusion around these separate approval processes, we have revised the drafting of Advice Note 3 under Condition 85 in Attachment 3 by splitting these into separate advice notes.
	(c) Discharge consent conditions Condition 14: Should this OMP be based on and/or refer the Operation and Management Manuals at Appendix 25B of the application?	Yes, we have updated Condition 14 (Stormwater Discharge Permit) and Condition 94 (Land Use Consent) to refer to a "final" OMP. This has now been added in the revised proposed conditions in Attachment 3.
	(d) Contamination consent conditions	• Engeo have prepared a Site Management Plan (SMP) for the project but this was inadvertently omitted from the application material – this is now provided Attachment 9 of this response.

• Condition 3: The advice note to this condition (and within Condition 5), includes reference to a CSMP, which has not been previously included in this condition. Please clarify (including whether a draft CSMP has been provided as this could not be sighted in the application materials). • Condition 13(a) introduces a reference to an Environmental Management Plan (EMP) (and that a SVR is to comply with this). Please clarify, noting that no draft version of an EMP appears to have yet been provided.	This SMP was always intended to form part of the application material and was listed in Attachment 1: Table of Reports in the proposed conditions. On this basis, we consider that no amendments are required to Condition 3. • The reference to an ‘Environmental Management Plan’ in Condition 13(a) is an error and has now been deleted.
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