

File ref: FTAA-2505-1019

5 September 2025

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Tēnā koe

Request for information from Kiwi Property No.2 Limited in relation to the Drury Metropolitan Centre – Consolidated Stages 1 & 2 application under the Fast-track Approvals Act 2024

The Drury Metropolitan Centre Expert Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (the Act), relating to the Kiwi Property No. 2 Limited application.

At the direction of the Panel, the EPA is seeking further information in respect of the following matters:

1. Open space provision;
2. Open space zoning;
3. Consenting, urban design and lighting considerations relating to billboards;
4. Urban design considerations related to Lot C;
5. Transport;
6. Waste management (design and management);
7. Stormwater (Stage 2 catchment);
8. Clarification of datums used for the architectural drawings and flood levels; and
9. Clarification in respect of several conditions.

These matters are set out in further detail in **Attachment 1** to this letter.

fasttrack.govt.nz | info@fasttrack.govt.nz | 0800 FASTRK

Fast-track is administered by the Environmental Protection Authority
Private Bag 63002, Wellington 6140, New Zealand | NZBN: 9429041901977

Supply of Information

In accordance with section 67(2) of the Act Kiwi Property No. 2 Limited must:

- a) Provide electronic copies of the information or report requested; or
- b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Please provide the further information to the EPA by **19 September 2025**.

If the information requested is not received, the Panel must proceed as if the request for further information has been declined.

Please note, the information will be provided to the Panel, and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact Application Lead, June Cahill by email at info@fasttrack.govt.nz

Nāku noa, nā

June Cahill

Application Lead

Attachment 1 Section 67 matters (Fast Track Expert Consenting Panel)

DRURY METROPOLITAN CENTRE – CONSOLIDATED STAGES 1 & 2

Section 67 matters (Fast Track Expert Consenting Panel)

The Panel has considered the application and supporting information, the comments received, and the Applicant's response to comments. It has identified several issues which it seeks further information on and/or which it anticipates could usefully be the subject of expert conferencing. This document provides further details in relation to the information requested in the letter from the EPA dated 5 September 2025 pursuant to s67 of the FTAA. A formal direction in relation to expert caucusing (relating to stormwater and transportation matters) will be issued separately.

The observations of the Panel contained in this document are intended to assist the Applicant in understanding the information requested and should not be construed as indicating any preliminary position of the Panel in relation to the substance of the Application.

1. Open Space

The Panel notes the Applicant's response to the Council's Parks department. The Panel seeks clarification of the Applicant's position in relation to the following aspects of the proposed provision of open space:

(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.

(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).

(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.

(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.¹

(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.²

2. Open Space zoning

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.

3. Billboards

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.

¹ 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)

² 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)]

We make the following further comments in respect of the billboards and relevant proposed conditions:

- (a) The AEE at 6.2.1 comments: *“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”*.

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.

4. Lot C connection

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:

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. 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 pedestrian accessway, located within Block B across the Te Hononga

Road. This creates a strong visual connection between the two blocks. (emphasis added)

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.

5. Transport

Following an initial review by the Panel's transportation expert, the following information is requested:

- (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.
- (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 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).
- (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.
- (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 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.
- (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 3) and if changes are required, do they change the bus tracking?

6. Waste Management Plan

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)).

7. Stormwater

Following an initial review by the Panel's stormwater expert, the following information is requested:

- (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.

8. Site levels

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.

9. Conditions

The Panel makes the following observations with respect to the conditions at this stage. Further work on conditions is anticipated through the proposed expert conferencing on stormwater/flooding and transportation matters):

- (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.

(b) Land use conditions

- Condition 85: Please clarify the reference (relevance) to s.176 (designation issue) under Advice Note 3.

(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?

(d) Contamination consent conditions

- 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.