

Your Comment on the Drury Centre Precinct

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Waka Kotahi – New Zealand Transport Agency		
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2. *We will email you draft conditions of consent for your comment

<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages

Waka Kotahi involvement in Drury East

Waka Kotahi has been extensively involved with development in the Drury East area including with this applicant. This involvement has largely related to three private plan changes (PC48, PC49 and PC50) which seek to re-zone a large area of land east of State Highway 1 which were heard by Auckland Council appointed commissioners in late 2021. Waka Kotahi supported the plan changes including Proposed Plan Change 48 – (Drury Centre Precinct) which relates to the current application. The plan changes include provisions to manage integration of land use development with required transport upgrades. We note no decision has yet been issued for the council on PC48.

The current application

The applicant proposes to subdivide and develop the land with eight new buildings for retail purposes (primarily large format retail) which would have a combined gross floor area of up to 35,000m²; and 13 balance 'superlots' which will be developed for residential purposes under future consents. The Assessment of Effects on the Environment (AEE) states that the superlots would accommodate 600-800 dwellings. The form and scale of development proposed in the consent documents is largely in line with the development anticipated by the plan changes.

Noting that more detailed upgrades such as frontage upgrades are also proposed, the relevant transport upgrades proposed by the applicant to support the development are:

- Westbound bus lane on Waihoehoe Road (southern side);
- Active mode provision on all roads; and
- Interim upgrade of Waihoehoe / Great South Road intersection to signals.

These upgrades and the proposed condition to tie later stages of the development to the opening of Drury Central train station generally align with those identified through the plan change process, and the level of development enabled by the proposed consent also aligns with the required upgrades. It is relevant to note that the plan change also includes staging to align development with the completion of the Papakura to Bombay (P2B) stage 1B project (part of the NZ Upgrade Programme) and the provision of a direct access from SH1 at the Drury Interchange to this development. However, this development when considered in isolation does not need these upgrades to be in place. Subject to the imposition of consent conditions as lodged with the application, Waka Kotahi considers the adverse transport effects of this development will be suitably managed (when assessed individually).

Integration with other developments

Waka Kotahi also notes that there are two other fast track consent applications (Waihoehoe Precinct and the Drury East Stage 1 Precinct) lodged in the area which have also been circulated by the EPA for comment. From a review of the documents lodged with those applications, it is apparent that cumulatively, the three Precincts would exceed thresholds identified in the plan changes. It is important that any consents granted within these areas take into account the cumulative impacts with respect to infrastructure, consistent with provisions proposed in the plan changes. If consents are granted with conditions that only refer to their own sites, while relying on the same infrastructure upgrades, there is a risk that adverse effects would ensue as each consent would be monitored individually rather than cumulatively across Drury East. There is a risk that provision of infrastructure such as the completion of stage 1B of the P2B project will be required for this development if it proceeds at the same time as others. This risk could lead to significant adverse effects and should be

addressed by consent conditions which cross refer to the Waihoehoe Precinct and the Drury East Stage 1 Precinct consents and require monitoring and enforcement to be on a cumulative basis. The provisions proposed in plan changes PC48, PC49 and PC50 anticipated this risk and the rules and assessment for transport upgrades were based on development cumulatively across the plan change areas.

Outcomes sought

Waka Kotahi seeks the following:

1. Suitable conditions to manage the potential cumulative effects of this development in combination with any other consents which have been (or may be) lodged and/or granted in the Drury East area and in particular the resource consents for the Waihoehoe Precinct and the Drury East Stage 1 Precinct.

Thank you for your comments