
30.09.2025

Dear Bryce,

Introduction

1. Thank you for the opportunity to review the proposal for a vehicle dismantling facility, associated buildings and curtilage storage area, earthworks, stormwater management, and planting at 395 Fitzgerald Road, Drury.
2. My full name is Gabrielle Katarina Howdle. I completed my Bachelor of Landscape Architecture (Honours) from Unitec, Auckland in 2016. I have been employed by Auckland Council as a landscape architect since 2017 and I currently hold the position of Principal Landscape Architect within the Tāmaki Makaurau Design Ope. My qualifications and experience are set out in Appendix A - Experience and Qualifications of this memo.
3. I confirm that the issues addressed in this memo are within my area of expertise, except where I state that I rely upon the evidence of others.

Statutory Context

4. The site is located primarily within the Future Urban Zone, with the north-east corner of the site subject to the Business – Light Industrial Zone under the Auckland Unitary Plan (Operative in Part). The north-east corner is also located within Drury South Sub Precinct D. Due to the FUZ zoning, outcomes anticipated within the Rural – Rural Production Zone apply to the site until which time it is rezoned.
5. It is understood that the application requires consent as a discretionary activity. I understand that the application requires consent for the following reasons relevant to landscape outcomes:
 - Earthworks within sediment control area (near a stream) that exceeds 2,500m² – E11.4.1 (A9) – RDA.
 - Earthworks greater than 2,500m² and 2,500m³ – E12.4.1 (A6) and E12.4.1 (A10) – RDA.
 - Earthworks which involve disturbance to riparian yards (within 1m of the stream edge) under C1.9 (2) – RDA.
 - Retaining walls within yards H17.6.4 under C1.9(2) – RDA.
 - Establishment of dismantling facility not provided for as an activity within the FUZ zone – C1.7 (1) – DA.
 - Construction of two warehouse buildings under H18.4.1 (A2)¹ – DA.
 - Retaining walls higher than 1.5m under H18.4.1 (A2)² -DA, and within yards under H18.6.3.

¹ The same activity status and standards as applies to the land use activity that the new building is designed to accommodate – the same activity status is applied being a discretionary activity.

² The same activity status and standards as applies to the land use activity that the retaining walls are designed to accommodate – the same activity status is applied being a discretionary activity.

Methodology

6. I can confirm that I have reviewed the relevant application material and further information responses including:
- Assessment of Environmental Effects prepared by Saddleback, dated 18.08.2025.
 - Landscape and Visual Effects Assessment prepared by LA4 Landscape Architects, dated 06.05.2025.
 - Site Plans prepared by Babingtons Civil and Environmental Consultants, dated 08.07.2025.
 - Warehouse Plans and Elevations prepared by Aztech Buildings, dated 28.04.2025.
 - Landscape Plans prepared by LA4 Landscape Architects, dated 01.07.2025.
 - Landscape Sections prepared by Babingtons Civil and Environmental Consultants, dated 26.08.2025.
 - Visual Simulations prepared by Cadabra, dated August 2025.
 - Copy of Ngāti Te Ata Feedback and Ngāti Tamaoho Feedback.
7. As part of my review of the proposal (as part of the s92 further information request process), I raised a number of matters in relation to the proposal as preliminary design comments for the applicant to consider. These are replicated below (s92 Stop the Clock letter – dated 03.06.2025)
- 1. From my review of the information provided, I am unable to fully assess the potential adverse landscape, rural character and visual amenity effects resulting from the proposal. Further information is required to understand whether the proposal, in terms of the layout, extent, scale etc is suitable for the context and/or any change or mitigation are required.*
 - 2. While the site is currently FUZ/Rural – Rural Production, the applicant notes the structure plan indicating the site for industrial use. Noting the sites to the north are zoned residential it would be anticipated that the visual amenity effects of the proposal are both managed as part of the current rural character of the area, as well as the future residential catchment. It is noted that the Business – Light Industrial zone requires planting of yards adjacent to residential zones, as well as appropriate screening of storage areas. It is recommended that the applicant explore further how the proposed works is able to manage the effects on the current rural catchment and future residential catchment.*
 - 3. It is recommended that the 10m front yard and 12m rear yards (Rural Production zone) remain clear of the proposed vehicle storage area to retain a setback from the road and retain rural landscape values (prior to the site being rezoned).*
 - 4. Retaining walls up to 2.5m are currently proposed close to the boundary, with no space to visually mitigate the height of the wall + fence (2.5m + minimum 1.1m fall fence). It is recommended that the retaining walls facing neighbours are stepped (or combined with gradual batters) to minimise the potential visual dominance and level changes as experienced from neighbouring sites. Stepped retaining walls with space between to plant*

between and in front of are recommended to manage the visual amenity effects on neighbours.

5. *It is recommended that the effects of the proposal, including landform modification, retaining, buildings, storage area are managed within the site, reliance on planting off site should not be relied upon to mitigate the effects on neighbours in particular. Given the current extent of earthworks, location of retaining and extent of gravel/hardstand, changes to the earthworks / structures and storage area may be required to provide for suitably sized areas of planting.*
8. While the applicant did undertake some changes to the proposal, including providing a planting plan. The overall proposal remains generally the same. I will describe the proposal further on in this memo.
9. I can confirm I am familiar with the area and have undertaken a site visit on 14.07.2025.
10. A Landscape and Visual Effects Assessment prepared by LA4 has been provided and refers to NZILA best practice Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines³ and utilises a seven-point scale.
11. The landscape assessment is supported by visualisations from two locations along Fitzgerald Road looking back at the site and proposal. However, the following aspects should be noted when referring to the visualisations, and as such should be viewed alongside the accurate site plans, elevations and landscape plans to fully understand the proposal (such as the location and height of retaining walls, 2m high mesh fencing, or the exterior areas proposed for car storage).
- *The visualisations do not show any retaining walls – this would apply for Viewpoint 2 (without planting version).*
 - *No fencing or gates are shown on any of the simulations.*
 - *No planting versions (while not proposed) shows a large gravel area that could have 2-high stacked cars on it which is not shown in the visualisations.*
 - *Some plants and trees from existing photos have not been removed from the visualisation version (e.g., Viewpoint 2 trees and plants behind/on top of warehouse) which would not be part of the final context.*
12. It was requested that the applicant provide cross sections and visualisations from neighbouring properties to be able to better understand the relationship between the proposed buildings, external storage area, existing and / or proposed planting and neighbours' dwellings or amenity spaces. While sections for the planting along boundaries were provided within the further information response, these did not extend to adjacent properties. No visualisations were provided from neighbouring properties; specifically requested 341, 359 and 377 Fitzgerald

³ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022

Road. As a result, my review will address the potential for adverse effects to occur on the amenity values of the residential (private) catchment, based on the information provided and having undertaken a site visit to site⁴. This may result in a more conservative position with respect to potential adverse effects on persons with respect to making a notification determination under s95 of the RMA.

13. I have undertaken my review with reference to best practice including the concepts, principles and approaches set out within Te Tangi A Te Manu. I have utilised the scale provided in Appendix B of this memo.
14. In undertaking my review of the proposal, I have considered the relevant matters of the AUP(OP), refer to Appendix C of this memo.

Proposal

15. The proposal is for a vehicle dismantling facility, associated buildings and curtilage storage area, earthworks, stormwater management, and planting on the 2.7679ha site at 395 Fitzgerald Road (See figure 1 below).

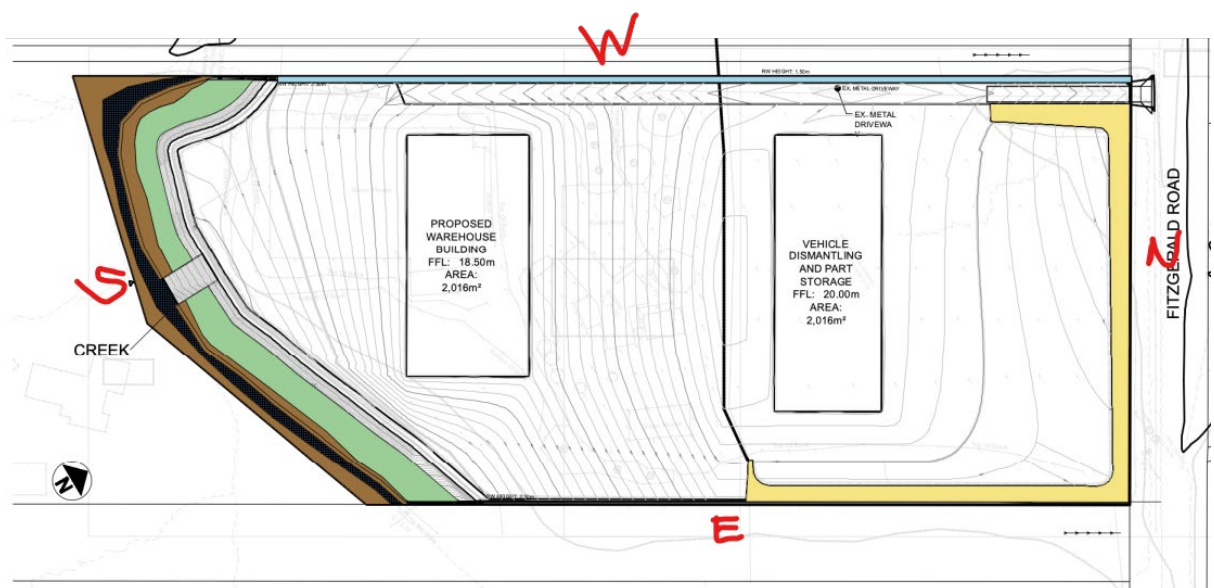


Figure 1: Landscape Plan - LA4

16. For clarity in reading this memo I have considered the boundary of the site along Fitzgerald to be the 'northern' boundary, with the 'eastern' boundary being the one along 411 Fitzgerald Road, 'southern' adjacent to 377 Fitzgerald Road, and the 'western' boundary towards 341 Fitzgerald Road (refer to Figure 1 annotations).

⁴ This did not include going onto neighbouring properties.

17. The facility will operate Monday – Saturday, 8am to 5pm. The applicant anticipates that hourly one medium sized service vehicle and one heavy-sized service vehicle will arrive and depart the site. It is understood that no signage or lighting is proposed.
18. All buildings on site will be demolished and removed. To provide for the facility and curtilage space earthworks over 25,255m² and up to 23,248m³ (14,605m³ of cut and 8,823m³ of fill) is proposed. This includes earthworks within 1m of the stream to the south of the site, retaining walls and earth bunds.
19. The retaining wall along the northern end of the western boundary will measure up to 1.5m high (internal facing), the retaining wall along the southern end of ‘western’ boundary will measure up to 2.3m high with the face to the adjacent property, the retaining wall along the eastern boundary will measure up to 2.5m high, with the face to the adjacent neighbour at 411 Fitzgerald Road. The bund along the road front will vary in height, up to 1m high, with a rear internal slope of 33%.
20. The facility will provide for two new large-footprint warehouse buildings for parts storage (southern building) and vehicle dismantling (northern building). Vehicle access will be provided via a formed driveway at the north-west corner of the site following the western boundary.
21. The dismantling building (northern building) will have a finished floor level of RL20 and an area of 2,016m², measuring 72m long x 28m wide x 7.725m high. This building will have a wider eave over one side measuring 5m wide x 72m long which does not appear to be included within the total 2,016m² coverage. This elevation will have four garage doors, with all other elevations having no garage doors, only pedestrian doors along the opposite elevation. The building will be clad in rib steel cladding, with a solid metal roof, with strips of translucent sheets, according to the elevational drawings provided.
22. The storage building (southern building) will have finished floor level of RL18.5 and an area of 2,016m², measuring 63m long x 32m wide x 7.9m high. Two garage doors (and two doors) will be provided on the long elevations, and one garage door on the shorter ends. The building will be clad in rib steel cladding with a solid long-run metal roof and dark coloured garage doors according to the elevational drawings provided.
23. The specific colours of the warehouse buildings are not noted on the drawings. It is noted that the visual simulations provided appear to illustrate a very lighter colour for the warehouse building cladding. A condition of consent is recommended to provide for recessive building materials / colours.
24. While two warehouse buildings are proposed, the application also includes the ability to store vehicles within the remainder of the site (excluding riparian 15.5-17m buffer at the south of the site). The applicant has noted that cars will be stacked up to two high. This would likely be greater than 2m high. Under the AUP(OP) any stacks or heaps of materials over 2m in height

- and in existence for more than one month are considered ‘permanent structures’ under Table J1.4.1. The latest further information response (25.09.2025) notes to achieve compliance, that a condition of consent could be imposed to ensure any stacking of cars is located outside the yards; being a 10m front yard and 12m side yard. This will be taken into consideration when assessing the potential effects of the proposal, including that vehicles could be stored across the entire site.
25. It is also understood that an LPG forklift and front loader will operate on site.
 26. Apart from the riparian buffer, and planting along the boundaries, and buildings, the remainder of the site will be fully metalled.
 27. The latest further information response (25.09.2025) notes that a 2m high mesh fence (details or appearance of this are not known) will be erected along all boundaries. Where retaining walls are required, the fence will be erected directly on top of the wall.
 28. A riparian and landscape buffer measuring between 15.5m – 17m, is proposed along the northern side of the tributary of the Hingaia Stream to the south of the site. The entire riparian and landscape batter / stream edge planting including a narrower portion on the southern side of the stream will provide for 1,752m² of native planting such as harakeke, purei, toetoe, koromiko, kanuka and mahoe, planted at 1.5L-2L. Much of the planting will be planted on a sloped batter between 27.1%-34.9%. It is noted that the planting buffer does not occupy the entire 20m riparian yard setback.
 29. Screen planting is proposed along the western boundary measuring a maximum 1.5m depth (in front of retaining walls along the boundary). This comprises *Pittosporum crassifolium* (karo) planted at 1L at 1.4m spacing. (See figure 2 (sections 2 & 3) below).

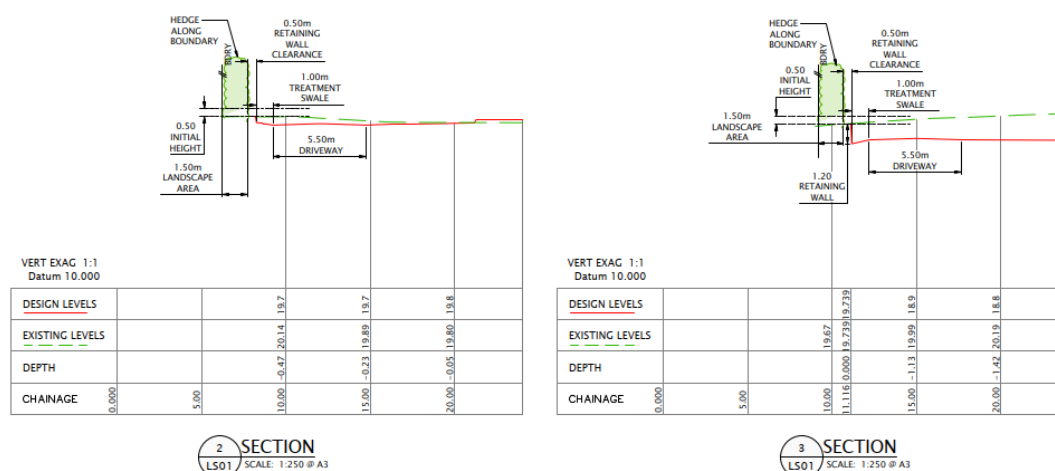


Figure 2: Western boundary sections.

30. Bund planting along the road boundary and the northern to middle portion of the eastern boundary is proposed. This comprises a mix of shrub and small tree species planted at 1L at 1.4m spacings. For the eastern boundary this will comprise planting within a 0.9m gap in front of the retaining wall (up to 2.5m high) and where spacing provides planting at the top of the wall (See figure 3 (section 8) and 4 (section 6) below). A mix (unknown set out) of planting is proposed along the front boundary (See figure 5 & 6 (section 1 & 7) below).

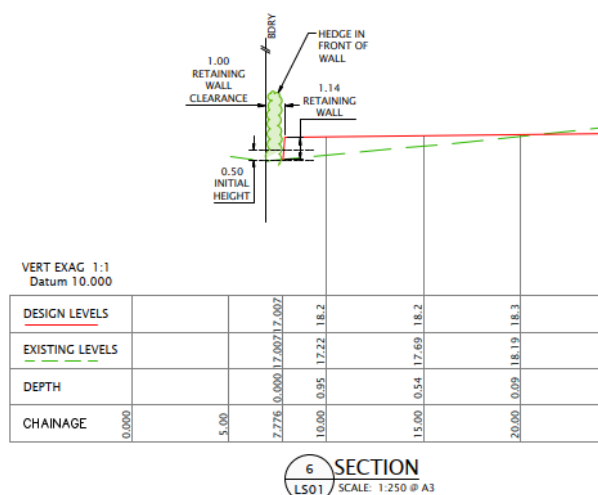
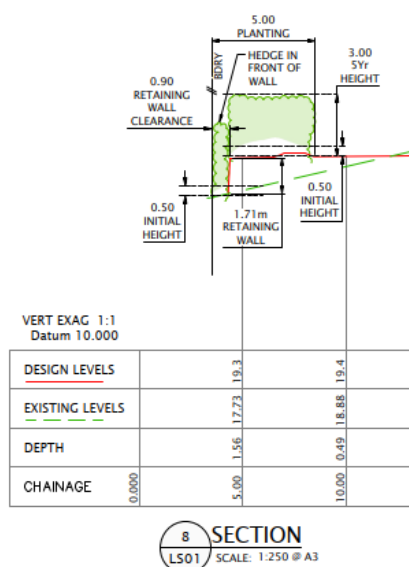


Figure 3 & 4: Eastern boundary planting - Section 8 shows more northern end, and Section 6 shows the southern end.

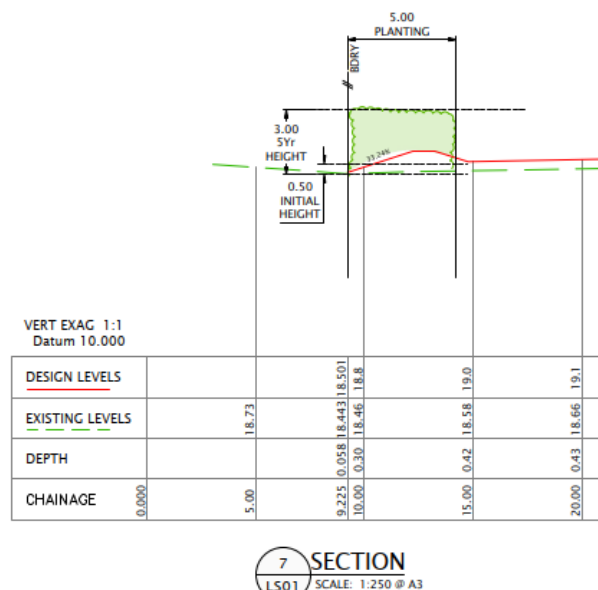
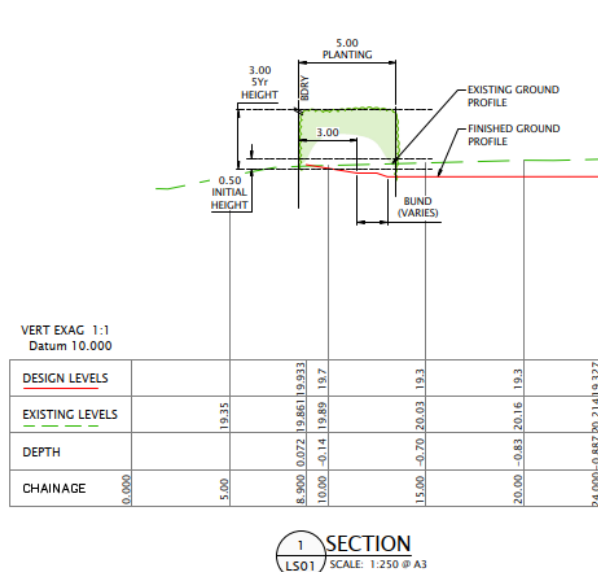


Figure 5 & 6: Road frontage planted bund. Section 1 shows the western end of the road frontage and Section 7 shows the eastern end of the road boundary.

Landscape Description and Context

31. The local character of the area is complex; this is due to current zoning changes in the area. To the north-west of the site is Drury Centre, with earthworks and changes to the land patterning to this area now underway. To the north lies historically rural land, rezoned to a mix of residential zones, including Terrace Housing and Apartments, Mixed Housing Urban (directly opposite the site) and Mixed Housing Suburban. However, the active zoning of these properties is not overly evident when driving along Fitzgerald Road, with the landscape continuing to retain rural characteristics and values, including rolling open landforms, generally dispersed buildings, larger glass houses, shelterbelts, and roads with no curbs, footpaths or lighting.
32. While the zoning anticipates a significant change in character to the surrounding areas, precincts as part of these recent plan changes (such as Drury South and Drury East) require development to be designed in a way that integrates with the natural environment and responds appropriately to landscape features, such as Fitzgerald Stream, Maketu Stream and Hingaia Stream and provide areas for open spaces and water management.
33. It is recognised that the somewhat untouched rural character that remains on the site and along Fitzgerald Road, is anticipated to change with the residential zoning to the north of the site. This is also evident when travelling ~750m north-west or ~950m south-east from the site, where the ongoing earthworks for the Drury Centre development (north-west) and developing industrial park (south-east), as well as the existing Drury quarry activity are appreciated. As such it is recognised that the wider historical rural landscape and activity associated with the land has already gone through or is anticipated to go through a level of change.
34. Under the Drury-Ōpaheke Structure Plan 2019 the site and surrounding sites are indicated as being Business – Light Industrial. This would be reflective of the zoning to the south of the site (Drury South Precinct). However, structure plans only provide an indication of future land patterns and use. A detailed examination of area / site constraints and opportunities in relation to activities, infrastructure, geotechnical, natural hazards, and natural features, etc. need to be assessed at time of rezoning. Therefore, the site and southern properties (between 20-72 Brookfield Road, and 211-395 and 417-497 Fitzgerald Road) remain FUZ (rural production) until such time they have been rezoned.
35. I generally concur with the site description provided within the Landscape and Visual Effects Assessment (Part 4.1 – 4.2) and specifically note its relationship with the tributary of Hingaia Stream which flows generally along the site's southern boundary. Overall, the site and adjacent properties retain rural characteristics, including gradual to rolling topography, open landscapes (grass, pasture, horticulture, crops), with clustered or dispersed buildings, often related to productive use where of a larger scale.

Review of Proposal

Landscape Effects

36. To enable the proposal, a level of earthworks is required to provide for a large level platform for the warehouse buildings, access, manoeuvring and external vehicle storage. Therefore, I disagree with the comment within the Landscape and Visual Effects Assessment which notes *“no significant earthworks or changes to natural landforms would be required”*⁵. While I agree that the site has already been modified by the rural productive use, generally the site topography first rising from the road, then falls gradually towards the eastern and southern boundaries (towards the tributary). The proposed earthworks would see the introduction of an earth bund along the road front, not overly common in this area, as well as retaining walls along the side boundaries and pushes much of the level change to the southern part of the site towards the stream. The proposed earthworks result in a southern batter with a slope of 27.1% - 34.9%; being relatively steep.
37. The proposal does include a riparian yard measuring between 15.5m – 17m wide on the northern side of the tributary. Noting the relatively low landscape quality of the tributary currently; due to the lack of riparian a stream edge planting, while not a full 20m planted buffer (which was raised as a point of interest within the engagement with mana whenua), is considered to improve the landscape (ecological) qualities of the tributary. Maintenance of the planting will be important noting the steep slope created by the earthworks.
38. Recognising the anthropogenic modifications to the site, and proposed riparian planting which will improve the values of the tributary within the site, overall, it is considered that the proposal will result in low-moderate adverse physical effects on the landform, but once planting establishes, low positive ecological landscape effects from the planting.

Landscape Character and Visual Amenity Effects

39. The AUP(OP) recognises that the FUZ zone is somewhat of a transitional zoning for rural sites that are identified for future urban use. However, until land is rezoned (through plan change process) any use and development of sites is required to maintain and complement rural character and amenity values (H18.3 (3)).
40. Therefore, while the site is located within a significantly changing wider environment, the local and immediate landscape retains its rural characteristics and values. This includes the gradual to rolling (hillocks) topography, varied to large site sizes, open (grass) and productive (grow houses, fruit trees, crops) characteristics, as well as fewer buildings (or being dispersed, or clustered and integrated with vegetation) and lack of infrastructure of an urban scale and nature. In my opinion while there is a variety of land cover and uses within the properties along Fitzgerald Road, the rural characteristics and values are retained.

⁵ Landscape and Visual Assessment, LA4, Part 5.7 Point iv.

41. The proposal will introduce a scale and nature of activity that is not currently present or experienced with this rural landscape. This being 2x 2,016m² large footprint warehouse buildings with associated external yard storage (compacted gravel) covering approximately ~18,600m² ⁶ and 2m high mesh fencing around the perimeter.
42. The applicant is open to a condition which ensures that stacked goods (vehicles) 2m or taller are located outside the yard setbacks, however this would still allow for vehicles under 2m high to be located within the yards. Therefore, considering the worst-case scenario, single vehicles could occupy the entire 10m front and 12m side yards (excluding planted extents), with the remainder of the site covered with vehicles stacked up to two high.
43. While the vehicles within the yard would be compliant with the building height standard of the FUZ zone (H18.6.2), it is the combined extent of proposed storage area for vehicles, and the two large warehouses which are considered to be of a significant scale which have the potential to diminish and detract from the landscape character and rural landscape and amenity values of the local area.
44. While planting (proposed at 1L-2.5L) are proposed along most of the boundaries, this is contained to 1.5m wide strips along the east and west boundaries and up to 5m within the front road boundary and therefore in my opinion is not of a scale comparable with the extent and potential scale of storage of vehicles that could be present on site.
45. While it is noted that the 2m mesh fencing will be located on top of retaining walls, it is not clear, whether this will be a standard mesh fence or more typical of a security fence, and where this will be located along the front boundary (in front or behind the 5m planting buffer). The location of the fence (in the front of planting) could further minimise the effectiveness of the mitigation being provided by the planting as the presence of a 2m high fence, not in keeping with the typical low post and wire or post and rail fencing seen within the immediate local area, will be more prominent along the road edge, suggesting a more urban use and character.
46. As discussed above (under Landscape Effects), the proposal does require a level of earthworks which are considered to modify the landform to a state that in my view will not reflect the rural characteristics of the area, being gradual to rolling landforms.
47. It is recognised that much of the public visual catchment will be transient in nature and will have either experienced the recent changes to the Drury area to the north, or the active quarry works and industrial park to the south. However, the landscape around the site along Fitzgerald Road retains a rural character, and therefore the proposal will defer from this, and detract from the

⁶ Overall Plan prepared by Babingtons (08.07.2025) notes an activity area of 22,710m², minus 2x 2,016m² buildings this equals 18,678m² remaining area.

generally open, low-density built form and patterning (except where associated with rural production / horticulture – such as glass houses) characteristics experienced.

48. Initially until the proposed planting establishes (5+years) the proposal will modify the rural landscape values to be one more industrial in nature. This is due to the proposal having the potential to occupy the majority of the site extent, which in my view will not retain the rural productive / horticultural or rural-residential characteristics of this landscape, including the gradual to rolling landform and openness (grass, pasture, wide vistas). In my view the proposal while not out of character in the wider landscape (e.g., to the south) will not maintain or complement the rural character and amenity of the local area (H18.3 (3)) and will result in moderate-high adverse landscape and rural character values.
49. From Fitzgerald Road, noting the transient experience of motorists and ongoing development for motorists travelling both north-west and south-east, but recognising they would still engage with a relatively impressionable extent of rural activity and character, would experience a moderate adverse level of effect on the visual amenity values.
50. If the application site were rezoned Business – Light Industrial, noting the rezoning of the land to the south, the proposal would not be out of character, and would be more anticipated within the landscape. In my view the maintenance of the planting, and retention of no stacked vehicles above 2m high within the front yard (being only 2m under H17) would remain important to manage the effects on residential amenity values to properties to the north. This is reflected in the B-LIZ which requires development adjacent to residential zones to manage adverse amenity effects on those zones (H17.3 (4)) and provide a buffer and screening (comprising a mixture of trees, shrubs and ground cover along the full extent of the yard) between industrial activities and neighbouring residential zones to mitigate adverse visual and nuisance effects (H17.6.4 Yards Purpose & H17.6.1 (2)).

Visual Amenity Effects – Private

51. In my opinion the proposal has the potential to have the greatest effect on visual amenity values, which in this instance are highly influenced by the landscape and rural character nature of the area, on immediately surrounding neighbours. Therefore, in addition to assessing the effects of the proposal on landscape character and visual amenity values as experienced from the local area (public road), I provide a review on the effects of individual neighbours below.

330 Fitzgerald Road

52. Located north-west of the site on the northern side of Fitzgerald Road, the property is zoned R-MHU but currently comprises a standalone dwelling at the southern end about 30m from the road, with the remainder of the site used for various stored personal items (sheds, vehicles). The site slopes down towards the road and to the north towards a stream tributary, with much of the site in grass, with short lengths of trees / shelter belts around the dwelling and to the north of the site. Rural post and timber and post and wire fencing border the site.

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53. From this property the application site would be in the periphery of views, rather than experienced directly on. While there is existing vegetation within this property and intervening in the view (e.g. planting within 341 Fitzgerald Road), this should not be relied upon to mitigate any potential adverse visual amenity effects arising from the proposal.
54. The scale of the warehouses will not be overly discernible from the dwelling on this property. It is considered that the front boundary may be visible, however the proposed planting, being 5m wide, will provide for a visual buffer to the external vehicle storage activity on site. Therefore, it is considered that the proposal will have very low adverse visual amenity effects on the residents of this property.

334 Fitzgerald Road

55. Located north-west of the site on the northern side of Fitzgerald Road, the property is zoned R-MHU but can be currently characterized as a long 2ha open rural site. The dwelling sits somewhat centrally to the site on a high point (~30m contour) with the land sloping away to the north towards a stream tributary on an adjacent property and down towards the road (~19m contour). The dwelling along with a collection of other buildings (garages/sheds) are surrounded by trees and vegetation. Rural post and wire fencing borders the site including along the road frontage. A low point (OLFP) straddles the southern boundary between 360 and 334 Fitzgerald boundaries and was wet (a pond) when I visited the application site.
56. The location of the dwelling of this property provides a degree of mitigation but noting the angle of the dwelling (if planting on site were removed/died) would look directly towards the site. It is recognised that the ongoing earthworks south of the site within the Drury South Precinct would also likely be visible to the residents of this property. Therefore, a level of change from rural to urban is already present within the outlook from this property, reducing the amenity afforded from a vast rural outlook – such as the loss of some rolling open landforms, with scattered vegetation and low-density built form.
57. Initially until the proposed planting along the front boundary establishes (5+ years) it is considered that the use of the site as a dismantling and vehicle storage could adversely impact on the amenity values of these neighbours when considering it with the loss of amenity resulting from the Drury South Precinct development. It is considered the proposal could result in low adverse visual amenity effects until planting establishes to soften the interface.

360 Fitzgerald Road

58. Located north of the site on the northern side of Fitzgerald Road, the property is zoned R-MHU but can be currently characterized as a long 2ha open rural site. The site presents the same hill form as 334 Fitzgerald, with the dwelling on this site located on the southern portion of the site, setback ~60m from the road. Smaller separate garages and shed are also contained within the dwelling curtilage of this site. Individual trees and rows of hedges are present around the dwelling and driveway. The remainder of the site is open (grass) with post and wire or post and

rail fencing. A low point (OLFP) straddles the southern boundary between 360 and 334 Fitzgerald boundaries and was wet (a pond) when I visited the application site.

59. This property is directly north of the site and will experience both the large-scale warehouse buildings and majority of the site being potentially occupied with stacked vehicles when. While planting is present along the road boundary of this property, the property appeared to be actively used to the north of the dwelling, as well as the paddock close to the road. Similar to 334 Fitzgerald Road, the works within the background (Drury South Precinct) will be evident, albeit to a slightly lesser degree as the dwelling is not as elevated as the dwelling at 334 Fitzgerald Road.
60. While glass houses are not out of character within rural landscapes, and can often be large structures, they are typically associated with rural activity, such as horticulture. Equally barns as shelter for farmed animals or hobby farming and equestrian are large structures, but in both instances are typically directly associated with a rural use and within open paddocks, retaining an open character associated with rural landscapes. In this instance the two large-scale warehouses will be associated with a large external gravel area, 2m high mesh fences, retaining walls and vehicle storage. Therefore, it is considered, even with the proposed planting in the foreground, that the proposal will detract from the anticipated rural values and outlook for this resident to a moderate adverse degree.

368 Fitzgerald Road

61. The property is a smaller (8,573m²) rear property accessed off Fitzgerald Road located at the crown of the landform (30m contour). The site (also zoned R-MHU) is accessed from a long driveway between 360 and 380 Fitzgerald Road, with two buildings located centrally. The outdoor area comprises grass areas, a pool and vegetation along the western boundary.
62. In my opinion this neighbour will have a similar experience to those at 334 Fitzgerald Road, due to their elevated nature. However, they will experience the site more directly when entering and exiting their property. The intervening properties at 360 and 380 Fitzgerald will provide some mitigation, however overall, I consider the property would experience low adverse visual adverse visual amenity effects. It is noted when arriving and departing their property a greater level of adverse visual amenity effects may be experienced (similar to that assessed for motorists travelling along Fitzgerald Road).

380 Fitzgerald Road

63. Located north-east of the site on the northern side of Fitzgerald Road, the 1.16ha property is zoned R-MHU but can be currently characterized as presenting rural in nature. The site similar to the properties north along Fitzgerald slopes down towards the road (~18m contour), with the northern portion of the property open and grass, with variously sized fenced paddocks. The main dwelling is located to the south of the property setback ~20m from the road, with a number of other buildings to the south and north of the main dwelling, all accessed from the

same driveway. The front boundary is well vegetated with a mix of trees and shrubs, which follow the eastern side of the driveway and site boundary.

64. While not directly opposite the site, the dwelling is located closer to the road than many of the dwellings in the area. A robust mixture of shrub, hedge and tree species is present along the southern boundary to the road. This provides screening to the proposal, however, should not be relied upon to manage the effects of this proposal. The outdoor living area for this property appears to be focused more north over their own property but does not exclude the southern lawn area from use.
65. The ongoing earthworks on 411 Fitzgerald Road would be in the foreground of the view for this property (if vegetation were removed), providing some context to the proposal. However, until the planting along the eastern and northern road boundary established the scale of the warehouses combined with the site being fully gravel and used for storage would diminish from the current rural landscape values afforded. In my opinion the proposal could result in low adverse visual amenity effects until the proposed planting establishes.

335 Fitzgerald Road

66. Located south-west of the site on the southern side of Fitzgerald Road, the 1ha rear property is zoned FUZ and can be described as retaining its rural qualities. The site retains a large open area (grass), with the dwelling and accessory buildings and structures located in the north-west and centre of the site. The dwelling is surrounded by large scale trees. The eastern boundary (close to the application site) is planted with a hedge, albeit sparser in parts.
67. This property appears to occupy the north-west corner and is accessed along a driveway west of 341 Fitzgerald Road, providing some mitigation through distance to the proposal. While there is some separation between the property / residents and the proposal, the proposal includes earthworks in the south-west corner which will create a steep slope (compared to the characteristic gradual to rolling landform). The southern warehouse will also be introduced within the eastern outlook of this neighbour. The proposed riparian and landscape edge planting once established (noting the 1.5L grade at time of planting) will provide some softening to the more active use of the proposal.
68. It is recognised that this property will retain a rural outlook to the west and south. Therefore, the proposal is considered to result in low adverse visual amenity affects until the planting along the riparian edge establishes.

341 Fitzgerald Road

69. Located west of the site on the southern side of Fitzgerald Road, the 1.68ha site fronts onto Fitzgerald Road and is zoned FUZ. The property presents a low hedge and rows of trees within the front portion of the site to the road. Behind this is a grouping of buildings varying in size (up to ~380m²). The central area includes a larger gravel area for parking. The southern portion of

the site is well vegetated, with the side boundaries also planted with hedge species. The eastern boundary, while planted appears to be later on in its life or not as well maintained, with portions of the hedge having gaps.

70. The property will retain northern rural views over the property, however the central building and outdoor lawn areas to the north and south will have views to the proposed warehouses and vehicle storage areas. The entire site will be changed from an open rural landscape with a productive use, including the associated glass houses, to one that is more urban and industrial in use, with large areas of compacted gravel, two large warehouse buildings and the capacity for ~18,600m² external storage of vehicles. In my view this will not maintain or complement the rural character and amenity for these neighbours.
71. While planting is proposed along the western boundary, this is within a 1.5m wide planting strip, planted at 1L high at time of planting. This planting will need to establish to a height of at least 2.3m before it softens the fill retaining wall, and greater to soften the appearance of the 2m high mesh fence, and activity present in behind.
72. Therefore, until the planting establishes to a mature height, the proposal is considered to result in moderate adverse visual amenity effects on this property.

359 Fitzgerald Road

73. Located south of the site on the southern side of Fitzgerald Road, the rear 1.4ha site is zoned FUZ. The property is accessed off a long driveway shared with the property at 377 Fitzgerald north of it. The driveway while planted along the boundaries, is not continuous in nature, with areas having either died, been removed or trimmed. The northern boundary of this property is planted with the remainder of the northern portion open (grass). The dwelling and accessory buildings located centrally within the site.
74. This property will experience the proposal when entering and existing their property along the driveway, as well as from within their property, this includes the proposed changes to the landform, retaining walls, and introduction of a large-footprint warehouse building and storage area. While the Drury South Precinct is undergoing change in the landscape, the effects of this are somewhat moderated by this property's location, which remains adjacent to FUZ (rural production land) east and west and the riparian esplanade to the south.
75. Therefore, in my opinion the proposed earthworks, warehouse buildings combined with the extent of external storage area will detract from the visual amenity values currently afforded and anticipated within this rural area. This includes the generally gradual to rolling landforms and open nature (pasture, horticulture use, vegetation) character of the site and area. Until the proposed riparian and landscape buffer planting establishes (medium term 5+years) to a more mature height that can ground the warehouse, integrate the landform changes and screen the external storage area, it is considered that the proposal will result in moderate adverse visual amenity effects for this neighbour. This also takes into consideration that to access the property

they have to travel past the site, which while proposing screen planting along the western boundary, will take time to establish, and will require access from the driveway to maintain it to provide for this mitigation.

377 Fitzgerald Road

76. Located directly south of the site on the southern side of Fitzgerald Road, this is a rear unusual, shaped site measuring 1.6ha. The site shares its northern boundary with the proposal site and is accessed off a long driveway that adjoins the application sites western boundary. Scattered trees are present along the northern boundary, otherwise much of the site area around the house, located somewhat centrally to the north of the property remains grass. Growing houses have been used historically on the property. The industrial development to the south and east is part of the existing environment for this property, noting however that the Drury Precinct Plan 1 indicates that the interface to this boundary is Public Open Space / Stormwater Management, which is required to enhance the stream ecology and natural habitat values of the Hingaia Stream through riparian planting.
77. While it is understood through comments received from mana whenua, that the dwelling on this property is not currently tenanted, the majority of the site works will be evident from this neighbour. This includes the landform modification – presenting a 27.1-34.9% slope to this neighbour, and the southern warehouse atop. While the surrounding visual context for this property is changing it is anticipated to retain a good level of amenity with the enhancement of streams and ecological areas. Therefore, until such time that the riparian and landscape planting establishes to a height that can significantly screen the stored vehicles and base of the warehouse building the proposal is considered to have moderate adverse visual amenity effects on this neighbour.

411 Fitzgerald Road

78. Located directly east of the site, this large 14.76ha property is primarily zoned Business – Light Industry and is within the Drury South Precinct. The site shares its western boundary with the application site. The site is currently undergoing earthworks, with some areas left in grass. The Hingaia Stream intersects with the south-west corner of this property.
79. The site is vacant (in terms of a dwelling or building), and is anticipated for industrial use, which is typically considered to be less sensitive to change. Therefore, while the proposal is considered to result in very low to no adverse visual effects for this property, it is considered that the proposal could impact on the ability for the adjacent site public open space outcomes under the Drury South Precinct.
80. It is also noted that the applicant has said in order to maintain the planting proposed along the eastern boundary with this neighbour, that they will need to access the planting from the within the property at 411 Fitzgerald Road. Therefore, the mitigation provided by the planting to integrate the retaining walls and soften the view of storage areas (including as seen from

Fitzgerald Road) relies on this neighbour allowing the applicant to access the property to maintain it.

Conditions of Consent

81. I recommend the following conditions of consent should the proposal be granted. These include conditions to ensure proposed planting can establish and be maintained for the life of the proposal.

Finalised landscape design drawings, specifications, and maintenance requirements

Prior to the commencement of any work on site the consent holder must provide to Council for certification, a finalised set of detailed landscape design drawings and supporting written documentation which have been prepared by a landscape architect. The submitted information must be consistent with the consented landscape concept plan(s) referenced in Condition 1 and, at a minimum, must include landscape design drawings, specifications and maintenance requirements including:

- Annotated planting plans which communicate the proposed location and extent of all areas of planting, including native revegetation planting along the stream, boundary screen planting and bund planting.
- Annotated cross-sections and/or design details with key dimensions to illustrate that adequate widths and depths are provided for all planting areas.
- A plant schedule based on the submitted planting plan(s) which details specific plant species, plant sourcing, quantities, spacing and height and/or grade (litre) / Pb size at time of planting.
- A retaining wall and fencing plan indicating the location and position of all retaining walls and fencing and specifications; materiality, height, finished appearance.
- An annotated pavement plan illustrating the proposed hard fill / storage area and access road.
- A landscape maintenance plan (report) and related drawings and specifications for all aspects of the finalised landscape design covering a minimum of five years, including in relation to the following requirements:
 - i. Irrigation / watering including during dry periods.
 - ii. Site and soil preparation (including the retention of any soil removed to be used for topsoil), fertiliser, staking, mulching and drainage.
 - iii. Weed and pest control.
 - iv. Plant replacement for all dead, dying, or damaged plants.

-
- v. Maintenance methodologies, inspection timeframes and frequencies, cyclical maintenance plan, contractor responsibilities and ongoing maintenance requirements for the life of the activity on site.

Planting Implementation

The consent holder must implement the certified planting under Condition # of this consent during the first planting season (May – September) following completion of earthworks and thereafter maintain this planting in accordance with the landscape maintenance and management plan certified under Condition #, for a minimum of five years.

Use of the site

The consent holder must undertake all landform modifications / land recontouring and planting prior to the site being used for vehicle dismantling or storage of vehicles purposes. The consent holder is to inform Council that the works have been complete, provide photographic evidence, and if considered necessary by Council, allow Council staff to access the site to confirm compliance and completion of works.

Planting Retention

Any existing vegetation and / or planting implemented under this consent (XXX) as illustrated within the Landscape Plans certified under Condition # must not be trimmed, damaged, or removed in any way for the life of the activity.

Building Materials and Finished Appearance

The two warehouse buildings exterior cladding, doors and roofing must be constructed in materials and colours or finished (e.g., painted) to have a recessive visual appearance. The material / colours must have a light reflectance value no more than 40% and be a colour within the grey, green or brown colour range.

Storage Area

All stored materials (vehicles) must be within the identified gravel area and must outside of the vehicles access, riparian yard and planting areas.

All stored materials (vehicles) must not exceed a height of 2m where located within the 10m front yard, 12m side yard, and 20m riparian yard.

All vehicles within the exterior area, and outside the yards must be stacked no more than two vehicles high.

Conclusion

82. The characteristics and values of the wider area vary greatly due to recent zoning changes; however, the immediate area retains rural characteristics and values which contribute to the amenity of locals.
83. While planting is proposed to help mitigate the proposed use and extent of the activity on site, I do not consider that it is of a scale that is able to maintain and complement the rural character and amenity values of the immediate area.
84. Overall, I am of the view that that the proposal will result in the following:
- Low-moderate adverse effects on the physical landscape values.
 - Low positive effects on the ecological landscape values once planting along the stream tributary establishes.
 - Moderate-high adverse effects on landscape and rural character values.
 - Moderate adverse visual amenity effects for motorists travelling along Fitzgerald Road.
 - Very Low to Moderate adverse effects on neighbours / residents.
85. Should the site be rezoned to Business – Light Industrial zone the landscape, character and visual amenity effects would be more anticipated under the AUP(OP). In my view the proposal would still need to retain the proposed riparian yard and landscape planting to the south of the site, as well as the planted front and eastern side yard buffer to provide screening to adjacent residential and open space zones.

Should you wish to discuss anything further regarding this memo, please contact me.

Kind Regards,

Gabrielle Howdle
Principal Landscape Architect
Tāmaki Makaurau Design Ope
Auckland Council

Appendix A: Experience and Qualifications

Name: Gabrielle Howdle

Organisation: Tāmaki Makaurau Design Ope, Plans and Places, Auckland Council

Role: Principal Landscape Architect

Qualification(s) and Training:

- Bachelor of Landscape Architecture (Hons.) (2016), Unitec Institute of Technology, NZ
- Environment Court and Expert Witness Training by DLA Piper (2019)
- Crime Prevention Through Environmental Design, Level 1. International Security Management and Crime Prevention Institute (2018)

Professional Membership:

- Graduate (5year+) Member New Zealand Institute of Landscape Architecture - Tuia Pito Ora

Experience:

- Principal Landscape Architect, Design Review Team, Tāmaki Makaurau Design Ope, Auckland Council (September 2023 – Current)
- Specialist Landscape Architect, Design Review Team, Auckland Design Office, Auckland - Council (September 2017- September 2023)
- Graduate Landscape Architect, Brown NZ Ltd. (April 2017- July 2017)
- Landscape Intern, Urban Logic (January 2015- February 2015)

In my role at Auckland Council, I have been involved in a number of consents ranging from small scale (e.g., single dwellings within sensitive landscapes, billboards) to apartment buildings, public realm and large scale greenfield and brownfield subdivisions. I have also more recently been involved in providing specialist input into applications going through the Covid-19 Recovery (Fast Track) Consenting Act 2020 process. I have provided evidence and attended a number of hearings:

During my time at council, I have been involved in a number of hearings, including the following:

- 258 – 268 Hobsonville Road, Hobsonville (The Tower / Apartment Building) – October 2018
- 52 -56 Anzac Street, Takapuna (Digital Billboard) – May 2019
- 443-445 Mount Eden Road, Mt Eden (Office and Retail within a HSA) – June 2019
- 1 & 3 Purewa Road, Meadowbank (Apartment Building) – November 2019
- 88 Remuera Road, Remuera (Apartment Building) – February 2020
- 58 Blake Road, Pukekohe (New school) - June 2020 (attended virtually)
- 118 Manuroa Road, Takanini (Residential Subdivision and Development in the SHZ) – September 2020
- 197 Botany Road, Howick (Retirement Village) – March 2021
- 400 Titirangi Road, Titirangi (Public Bathroom Facilities - ridgeline and local street) - April 2021

- 24 Summit Drive, Mt Eden (2-Lot Vacant Subdivision and LUC consent for retaining wall and works within a H.S.A) - November 2021
- 79 College Road, St John (Residential development and subdivision) - 14th and 15th December 2021 and 18th February 2022
- 141 Bader Drive, Mangere (Digital Freestanding Billboard) - 20th October 2022
- 82 & 100 Kahikatea Flat Road (Rural Subdivision) - 4th November 2022
- 75 Pomona Road, Kumeū (Childcare centre – Rural Countryside Living) – 7th June 2023 & 2nd August 2023 (online)
- 96 Beach Haven Road & 13 Cresta Avenue, Beach Haven (4x three-storey walkups - Single House Zone) - 4th, 5th & 6th of July 2023
- 520 Great South Road, Papakura (Land use and subdivision - Residential Mixed Housing Urban) - 10th of August 2023
- 8 Pitt Street, City Centre (2x portrait digital billboards and false wall extensions - City Centre zone) - 3rd of November 2023
- 76 - 80 Great South Road Remuera (overheight mixed use, primarily residential development - two buildings - Remuera) - 1st November 2023
- 81 New North Road Eden Terrace (infrastructure in a viewshaft) - 2nd of February 2024
- 1153 Leigh Road, Matakana (Childcare centre - Rural) - 8th February 2024
- 492a Pollok Wharf Road (AM Broadcast Tower 102m high) - 17th July 2024
- Private Plan Change 93, Warkworth South - 4th - 7th November 2024 & 4th December 2024
- 538 Karangahape Road (Commercial building over height) - 28th - 29th November 2024
- Private Plan Change 101, 167 Pilkington Road - 2nd December 2024 (online attendance)
- 83 - 85 College Hill (2 New Street) (Residential building over height) - 11th - 12th December 2024
- 75 Remuera Road (temporary crane in viewshaft) - 30th April 2025 (online hearing)
- 25 Ararimu Road (lock up and storage facility mixed rural land) - 26th May 2025

Appendix B: Rating Effects Table – 7-Point Rating Scale of Effects extracted from Te Tangi a te Manu – As it relates to RMA situations regarding ‘less than minor’, ‘minor’ and ‘more than minor’.

In this instance, I considered that a rating of ‘low’ would equate to a minor effect, with very low equating to a less than minor effect.

						SIGNIFICANT
LESS THAN MINOR		MINOR	MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

Appendix C: Relevant Outcomes of the AUP(OP)

H18 Future Urban Zone

H18.2 (1) - Land is used and developed to achieve the objectives of the Rural – Rural Production Zone until it has been rezoned for urban purposes.

H18.2 (2) - Rural activities and services are provided for to support the rural community until the land is rezoned for urban purposes.

H18.2 (3) - Future urban development is not compromised by premature subdivision, use or development.

H18.2 (4) - Urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes.

H18.3 (1) - Provide for use and development which supports the policies of the Rural – Rural Production Zone unless that use and development is inconsistent with policies H18.3(2) to (6).

H18.3 (3) - Require subdivision, use and development to maintain and complement rural character and amenity.

H18.6.3 Yards – Purpose to ensure adequate and appropriate separation distance between buildings and site boundaries to minimise:

- adverse effects of buildings on the character and amenity values enjoyed by occupiers of adjoining properties; and
- opportunities for reverse sensitivity effects to arise.

Front yards 10m.

Side or rear yards 12m.

Riparian yard 20m.

H19 – Rural Zones

H19.3.2 (1) - A range of rural production, rural industries, and rural commercial activities take place in the zone.

H19.3.2 (2) - The productive capability of the land is maintained and protected from inappropriate subdivision, use and development.

H19.2.3 (1) - The character, amenity values and biodiversity values of rural areas are maintained or enhanced while accommodating the localised character of different parts of these areas and the dynamic nature of rural production activities.

H19.2.4 (1) - Manage the effects of rural activities to achieve a character, scale, intensity and location that is in keeping with rural character, amenity and biodiversity values, including recognising the following characteristics:

- a. predominantly working rural environment;

-
- b. fewer buildings of an urban scale, nature and design, other than dwellings and their accessory buildings and buildings accessory to farming; and
 - c. a general absence of infrastructure which is of an urban type and scale.

H19.10.3 Minimum yards setback requirement – Purpose to ensure adequate and appropriate separation distance between buildings and site boundaries to minimise:

- adverse effects of buildings on the character and amenity values enjoyed by occupiers of adjoining properties;
- opportunities for reverse sensitivity effects to arise; and
- to ensure buildings are adequately setback from streams and the coastal edge to maintain water quality and provide protection from natural hazards.

H17 Business – Light Industry Zone

H17.2 (3) - Adverse effects on amenity values and the natural environment, both within the zone and on adjacent areas, are managed.

H17.2 (4) - Development avoids, remedies or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones.

I410 Drury South Industrial Precinct

I410.2 (1) - Development maintains and enhances the stream ecology and the natural vegetation and habitat values of the Hingaia and Maketu streams.

I410.2 (3) - Landscape and visual amenity values within the precinct are maintained and enhanced (particularly when viewed from State Highway 1).