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I hereby give notice that a hearing by commissioners will be held on:

**Date:** Monday 18 to Friday 22 November 2024  
**Time:** 9.30am  
**Meeting room:** TBA  
**Venue:** Level TBA, Auckland Town Hall  
301/317 Queen Street, Auckland

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**PRIVATE PLAN CHANGE 94**  
**APPLICATION MATERIAL VOLUME 3**  
**WAIRAKA PRECINCT IN CARRINGTON ROAD,**  
**MT ALBERT**  
**MINISTRY OF HOUSING AND URBAN**  
**DEVELOPMENT – HANNAH MCGREGOR**

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**COMMISSIONERS**

**Chairperson** Greg Hill (Chairperson)  
**Commissioners** Gavin Lister  
Councillor Chris Darby  
Vicki Morrison-Shaw

**Chayla Walker**  
**KAITOHUTOHU WHAKAWĀTANGA**  
**HEARINGS ADVISOR**  
Telephone: 09 890 2009 or 027 231 5937  
Email: [chayla.walker@aucklandcouncil.govt.nz](mailto:chayla.walker@aucklandcouncil.govt.nz)  
Website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

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**Note:** The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

## **WHAT HAPPENS AT A HEARING**

### **Te Reo Māori and Sign Language Interpretation**

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

### **Hearing Schedule**

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

### **Cross Examination**

No cross examination by the applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

### **The Hearing Procedure**

The usual hearing procedure is:

- **The chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The applicant** will be called upon to present their case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented their case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
  - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
  - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The applicant or their representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

### **Please note**

- that the hearing will be audio recorded and this will be publicly available after the hearing
- catering is not provided at the hearing.

**A NOTIFIED PRIVATE PLAN CHANGE TO THE AUCKLAND UNITARY PLAN BY  
MINISTRY OF HOUSING AND URBAN DEVELOPMENT – HANNAH MCGREGOR**

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9 February 2023

John Duthie  
Director  
Tattico Limited  
PO Box 91562 Victoria Street  
Auckland 1142

via email: [john.duthie@tattico.co.nz](mailto:john.duthie@tattico.co.nz)

Dear John,

**RE: Clause 23(1) Resource Management Act 1991 Further Information – Private Plan Change request by the Ministry of Housing and Urban Development to rezone land within the current Wairaka Precinct, to amend the provisions within the existing precinct and to rename the precinct “Te Auaunga” – 1 – 139 Carrington Road**

Thank you for the private plan change request received by Auckland Council on 22 December 2022 to rezone land within the current Wairaka Precinct, to amend the provisions within the existing precinct and to rename the precinct “Te Auaunga” – 1 – 139 Carrington Road.

The Plan Change will be termed “Private Plan Change # - Te Auanga Precinct (PC#)”. A plan change number will be allocated at formal notification stage.

Further to this request under Clause 21 to Schedule 1 of the Resource Management Act 1991 the Council has now completed an assessment of the information supplied.

As you would be aware, Clause 23(1) provides as follows:

**23 Further information may be required**

- (1) Where a local authority receives a request from any person under clause 21, it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand-
  - (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of Schedule 4;  
or
  - (b) the ways in which any adverse effects may be mitigated; or
  - (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
  - (d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

Pursuant to Clause 23(1) (“Cl 23”) the Council requires further information to continue processing the private plan change request.

Appendix 1 attached to this letter sets out further information required (“RFIs”) and reasons for the requested information.

I have provided Appendix 1 in Word for you, so as to enable easier formatting of your responses. Regardless, please use the index number in the table for your responses – that will make it easier to refer back to the relevant specialists in the Council team.

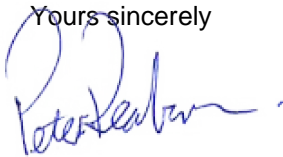
Please note that this CI 23 refers to further information considered necessary for a better understanding of the application. It should not be seen as a full indication of the issues that may be identified through the process. However you will see in Appendix 1 that there are additional comments / observations relating to some concerns the Council specialist team have identified when reviewing the proposed plan change. These matters have been raised now for the Applicant’s consideration but are not specifically RFIs.

Appendix 1 identifies the specialist relevant to the various categories of RFI, together with their contacts. Please feel free to contact the specialist direct if there is any question relating to the RFI, or any other matter. However please advise your team that I would like to be copied in on any email correspondence.

Our preference would be for any responses to the RFIs, or any other changes to the lodged documentation, to be made to the documents themselves rather than, say, addenda to the currently lodged documents. The amended documentation would then essentially replace the current documents. This would make things easier for the next stages in the process.

If you have any queries please do not hesitate to contact me.

Yours sincerely



Peter Reaburn  
**Consultant Planner for Auckland Council**

## APPENDIX 1

### Te Auaunga PPC Application – Auckland Council RMA Clause 23 Requests and Response

Applicant: Ministry of Housing and Urban Development

Address: 1 – 139 Carrington Road Mt Albert

Proposed activities: PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
<b>URBAN DESIGN</b> (Specialist: <b>ALISTAIR RAY</b> Jasmx 021 621707 <a href="mailto:Alistair.ray@jasmx.com">Alistair.ray@jasmx.com</a> )				
UD1	Urban Design Assessment methodology	Please clarify what methodology has been used for the urban design assessment.	<p>Chapter 2.0 – Methodology lists 3 elements that have informed the assessment but does not provide a clear methodology for assessment. What recognised good practice urban design principles have been used to make an assessment?</p> <p>The NZ Urban Design Protocol is quoted, but the UD Assessment then makes no further mention of any of the qualities listed in the Protocol and does not use recognised urban design principles to make the assessment.</p> <p>In the absence of a clear assessment methodology, the UD Assessment focusses on matters more related to planning such as shading, privacy etc, but fails to address bigger picture urban design principles such as how to create a neighbourhood with a clear character and its own identity; creating a place where public and private spaces are distinguished; a place with attractive and successful outdoor areas; creating a place that is easy to get to, and move</p>	

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			<p>through and that is easy to understand; a place that is adaptable over time; a place that is sustainable and enduring; and a place that has variety and choice etc.</p> <p>The assessment should demonstrate how the proposal (and the Precinct Plan) meets these urban design objectives.</p>	
UD2	Taller Buildings – Methodology for Assessment	Please provide details of the design rationale and design principles used to inform the location of the taller buildings.	<p>In many places throughout the application documentation, the argument is made that taller buildings are suitable in the north-west part of the site due the presence of the motorway interchange.</p> <p>For instance, p.103 of the Planning Report states:</p> <p><i>It provides a range of housing typologies with high rise residential development in a part of the isthmus, because of the motorway interchange, that is well suited for more intensive forms of development.</i></p> <p>It would be helpful to understand why the presence of the motorway interchange is used to justify additional height.</p> <p>There is actually no access to the motorway in this location (the nearest access point is Western Springs over 2km away) and in any case, access to a motorway system is not typically regarded as a design principle for justifying intensive residential development and taller buildings. Tall buildings policies around the world use proximity to important public transit (not just transport infrastructure), important nodes or centres, access to employment and other amenities (retail etc).</p>	



#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			Whilst there may be a case for taller buildings, it is unclear why the presence of the interchange is used as a justification.	
UD3	<i>Taller Buildings - Dimension</i>	<p>Please clarify how the maximum dimension has been derived and how building form will otherwise be controlled.</p> <p>NB: The response to this RFI can be combined with the response to L10</p>	<p>The control of taller buildings is recognised as important, but it is unclear what building forms may be possible using the suggested method of maximum dimension. The concept of tall, slender towers is quoted, which are widely accepted as more appropriate forms than squat or slab-type buildings.</p> <p>Yet if a residential building of 18m depth is provided (quite reasonable for double-loaded apartments) the maximum dimension of 50m would allow a 46m long building up to a height of 54m. Even the tallest tower at 72m high could be 38m long. These forms would not be considered slender "towers" and could result in building forms not entirely suitable. Indeed, the Visual Simulations show buildings that are more slabs than towers.</p> <p>It would be helpful to understand how these dimensions have been derived and the range of building shapes that could be produced, together with a commentary on how the building shape will be controlled. The design quality of such buildings will be crucial, and it would be helpful to understand what additional design controls / assessment criteria could be used to ensure these taller buildings are of exemplary design quality.</p>	
UD4	<i>Building Heights - 35m height</i>	Please clarify how good quality design outcomes can be delivered with the heights proposed across the site.	The UD Assessment and Planning Report focus on the increased yield that additional height will bring, but with little discussion on the impact on the quality of the urban environment. There is discussion around the effects on property outside of the site, but little	

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			<p>discussion around the impact that having many 35m buildings (which could be 11 storeys) would have on the quality of the urban environment, the spaces between the buildings and amenity of residents (privacy, outlook, access to sunlight). If the Precinct Plan is relying on the AUP for standards, then these 11 storey high buildings could be just 12m apart. Also the character of the precinct and the quality of the environment is partly informed by the massing of the buildings as much as the height. Many slender buildings, with plenty of space around them, and variation in height, will produce one type of environment. A few slab-type buildings with less space, and consistency in height could produce quite a different outcome.</p> <p>It would be helpful to understand how potentially adverse effects can be managed through the application of the proposed plan change provisions. Some precedents of neighbourhoods of predominantly 35m buildings would be helpful to understand the impact and how any adverse effects could be managed.</p>	
UD5	<i>Building Heights - 27m height limit</i>	Please provide a more detailed assessment of what effects 27m buildings will have on the streetscape.	Much of the assessment focusses on the effects of the increased height on the properties on the east side of Carrington Road, but there is little discussion on the impact on the streetscape itself. Whilst it is acknowledged that the character of this street will change to urban, there is quite a difference between 5/6 storeys (18m) to 8/9 storeys (27m) in terms of the potential over-bearing / over-shadowing of the street and the impact on all the users of the street. Jan Gehl in particular talks about the connections and	

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			<p>relationship of occupiers of upper floors to people within the street.</p> <p>The intended character of the street is unclear. 8/9 storey buildings with active (non-residential) uses on the ground floor will result in a different character than one where residential is used along the ground floor, and the intended character will help to inform the debate about the appropriate height.</p> <p>It would be helpful to add some commentary on these issues and understand some precedents for this scale of building in a non-central city location.</p> <p>Furthermore, the cross-sections provided suggest the land is flat either side of Carrington Road. In reality there are changes in levels (both rising up and falling away), which could have further impact on the relationship of buildings to the street and it would be helpful to understand these impacts.</p>	
UD6	<i>Retail and other non-residential facilities</i>	<p>Please provide clarification as to how retail and community facilities will be appropriately provided, sized and located to serve the needs of the scale of community enabled by the proposed provisions.</p> <p>NB: The response to this question may be combined with the RFI in EA1.</p>	<p>The Precinct Plans do not show the proposed location of retail or other community facilities within the Precinct.</p> <p>With a potential population of 10,000+ residents and with parts of the site not within easy walking distance of Pt Chev or Mt Albert centres, the role of retail and supporting uses (such as early childhood education, medical / healthcare) will become critical to the success of this community.</p> <p>Acknowledging that the Business Mixed Use Zone provides some enabling provision it is difficult to understand the amount and location of such uses, how people will be able to access them (noting car ownership is intended to be low and walking will be</p>	

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			<p>promoted) and how these will be successfully integrated into the neighbourhood. The provision of these facilities could help to create a heart / gathering place for this new community and be the centre-piece of the neighbourhood. But there is little to no discussion around the amount, location and design principles that will need to be employed to ensure a successful "centre" is created.</p> <p>Related to this is the issue of walkability. The centres of Pt Chev and Mt Albert are relatively close, but not necessarily accessible by walking. There is no analysis around the actual walking catchment from these centres, how much of Te Auaunga precinct falls within these catchments and the safety, efficiency and quality of connections required / to be provided. This will help determine the amount of services required on the site as well as the provision of pedestrian / cycle routes within and to / from the site.</p> <p>The above assessment should make comment about the EPA applications currently being processed include provision for retail. They should be assessed as to their appropriateness in meeting, or partly meeting, the ultimate needs of the precinct as a whole.</p> <p>(see also EA1 and P9)</p>	
UD7	<i>Housing mix</i>	Please clarify how a range of housing typologies can be secured.	Successful neighbourhoods rely on a range of typologies, sizes and tenures. A precinct dominated by one typology could create unwanted social and design outcomes, especially if dominated by small one-bedroom apartments. It is not clear what mechanisms / controls will be employed to manage /	

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			deliver a range of typologies, particularly if buildings are being provided by different parties.	
UD8	<i>Precinct plan maps</i>	Please provide up to date maps.	The Precinct Plan maps are all based on old cadastral maps that do not show SH16. This makes it difficult to fully assess the spatial relationships at the northern part of the site. The maps should be updated to reflect the current environment.	
<b>Non CI23(1) request matter/other comments</b>				
UD9	<p>It is a concern that the plan change is not based on an explicit vision for the type of community envisaged. There is no master plan provided and thus little confidence that each part of the site will be developed within an overall plan that ensures adequate provision of facilities for all of the community and recognition of the local and wider context within which each development should be assessed.</p> <p>Whilst it is acknowledged that this proposed Precinct Plan is an amendment of an existing plan, the current precinct does not anticipate the levels of (predominantly) residential development now proposed.</p> <p>A new community is proposed of 4,000+ dwellings / 10,000+ people. This is a significant development (a medium sized town in New Zealand terms) and delivering such a community in a well-functioning urban environment is a complex process.</p> <p>A masterplan would typically be expected for such a project to demonstrate how all the elements are expected to come together to produce good urban outcomes.</p> <p>It is not clear at what point the overall / high-level design approach to this site can be assessed by Council.</p> <p>It is assumed that if successful, this Precinct Plan will then allow for individual consents to be submitted. At that point, assessment of the bigger picture will not be possible, which means that this stage of the process is the only time to assess the design qualities of the intended approach.</p> <p>The two most successful large-scale urban environments in Auckland in recent times have both been guided by comprehensive masterplans and associated design quality controls and processes – Wynyard Quarter and Hobsonville Point.</p>			

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			<p>Yet for this Precinct, no masterplan is supplied and the provisions within the Precinct Plan and the AUP are being relied upon to deliver quality design outcomes.</p> <p>For clarity, a “masterplan” is not simply a pretty illustration showing the intended buildings, streets, landscape etc. It is understood such a picture is hard to produce for multiple landowners and represents just one potential scenario at a point in time.</p> <p>On the contrary, a masterplan is a complex document with many parts, including a framework to guide development over a long time that allows for flexibility and adaptability to changes in market demand.</p> <p>But a masterplan should provide:</p> <ul style="list-style-type: none"> <li>- A clear vision and design principles, against which all subsequent developments are assessed.</li> <li>- A three-dimensional framework to guide the location of open space, uses, movement and buildings, including identifying development parcels in the form of words and plans / images.</li> <li>- An implementation plan defining the delivery strategy and staging as well as the design quality control process – e.g., the use of design guides or design panels.</li> </ul> <p>Without this information it is difficult to assess the proposed urban design qualities of the Precinct.</p> <p>It is hard to understand if this Precinct is intended to function as a new community in its own right, or whether it is simply new (predominantly) residential development that is intended to support and rely on existing neighbouring services and amenities. Although this may be a subtle point, it is vital in understanding how the Precinct will be designed and what ancillary services will be required, where they will be located and how they will be integrated.</p> <p>The assessments provided are unclear on this point. In parts, it suggests this is intended to function as a new community in its own right.</p> <p><i>“A complete community, providing the opportunity for people to live, work and learn within the precinct, while benefiting from access to public transport and a well-connected walking and cycling network.” P.16 UD Assessment</i></p> <p>Yet there is little discussion on the provision of ancillary services to support a community such as schools, early childcare education, medical / healthcare, employment and what is the appropriate level of retail. It is understood there is a tension between providing competition to nearby local centres and providing sufficient on-site facilities to avoid excessive vehicle movements. A retail demand study would help to assess the appropriate levels.</p> <p>It would also be helpful to understand the proposed design quality control process. As stated above, successful new precincts often rely on a combination of design guides and design panels. With such a large precinct, reliance on the AUP and basic</p>	

#	Category of information	Specific Request	Reasons for request	Applicant Response (please reference any attachments)
			<p>consenting process alone is unlikely to result in consistently high-quality design outcomes and an urban environment that is more than just a collection of buildings.</p> <p>See also P9 and P10.</p>	

<b>Open Space / Parks / Community Facilities</b> (Specialist: <b>ROJA TAFAROJI 021 937084 <a href="mailto:Roja.tafaroji@aucklandcouncil.govt.nz">Roja.tafaroji@aucklandcouncil.govt.nz</a></b>			
OS1	Community Open Space and Community Facilities	<p>Please provide an analysis, utilising a methodology appropriate to the scale and density of built environment proposed, of the community infrastructure, including for example publicly accessible open spaces, sports facilities, pools, libraries, halls and educational facilities necessary to provide for the local community that will be enabled by the plan change.</p>	<p>The open space analysis in the application focuses on explaining what <i>is to be</i> provided rather than what <i>is required to be</i> provided to meet the needs of the community. The community enabled by the changes proposed is a substantial one and, by the very nature of what is proposed, well beyond that envisaged by the current AUP provisions. The demographic nature and scale of that community requires a bespoke analysis of its community open space and community facility needs.</p> <p>Reliance should not be placed on Council's Parks and Open Space Acquisition Policy 2013 and Open Space Provision Policy 2016. This is a scale and density of development not envisaged by those policies.</p> <p>Note, however, that reference should be made to the Albert-Eden Sport and Recreation Facility Plan (2021) which provides a picture of the current provision and future demand for sport and active recreation facilities in the Albert-Eden area and identifies need for future facility provision. This report identifies a clear sport field shortfall in the Albert-Eden area. Also, one indoor facility has been closed down at Unitec campus due to the developments on the site.</p> <p>The analysis requested should be expressed in quantitative and qualitative terms – for instance the amount of land as well as the type of land and how it could / should be developed.</p> <p>The analysis should also detail where in the precinct needs will arise. For instance, the needs are likely to vary according to where varying densities of</p>



			<p>development are enabled, and whether the expected demographics within those areas may vary. Note that this geographically-specific analysis also relates to yield and location of yield RFIs under Planning - P1 below.</p> <p>This analysis will then inform what the plan change should contain as a management framework to ensure the analysis of needs can be met (see OS2). As an example, the analysis may show what the appropriate sizing is of a neighbourhood park, and whether more than one such park should be provided.</p> <p>The analysis would be assisted, in more "real world" terms by reference to the recent three EPA resource consent applications, what typologies are being proposed there, what provision those applications make for community facilities and what they may rely on being provided in the wider precinct.</p>	
OS2	Community Open Space and Community Facilities	<p>Please provide an analysis of how the community open space and community facility needs identified from RFI request OS1 above will be able to be satisfied under the precinct plan and other provisions proposed in the plan change.</p> <p>The analysis should relate to the possible needs identified under the RFI in OS1, including in relation to various development types, expected demographics and locations.</p>	<p>It is noted that NPS UD Policy 2.2 requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. Under Policy 3.5 Availability of additional infrastructure local authorities must be satisfied that the additional infrastructure (including public open space) to service the development capacity is likely to be available.</p> <p>The following provisions under the AUP RPS B2.7 Open space and recreation facilities are also particularly relevant:</p> <p>B2.7.1. Objectives</p>	

			<p>(1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.</p> <p>B2.7.2. Policies</p> <p>(1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.</p> <p>(2) .....</p> <p>(3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.</p> <p>(4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.</p> <p>Part 6.11 of the AEE refers to “The need to reflect the expanded scope of the residential development has prompted a reconfiguration of open space.” Depending on what the analysis sought under OS1 above concludes, a simple reconfiguration of space may be shown as not being sufficient.</p> <p>If the intention is to provide a mix of public and privately owned and managed community open space and recreational facilities there needs to be an indication of what that mix may be. The public (or wider precinct / community) needs should be committed on the precinct plan, with other needs clearly specified in the provisions.</p> <p>The application documents refer to private open space, and communal open space, however do not specify standards or any other explanation or provisions as to how this should be provided. For instance, Appendix 3 to Boffa Miskell's Landscape</p>	
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			<p>Assessment refers to Pocket Parks, however also to these being "Voluntarily provided".</p> <p>The proposed provisions refer to satisfying open space needs, however it is not certain what the targeted provisions for community open space and recreational facilities should be, including within the different parts of the precinct. As an example, the tower developments in the north-western part of the site are more than 400m from the proposed neighbourhood park. Reliance appears to be placed on the northern park next to the Oakley Hospital but there is a question as to whether that park would or could function as satisfying the needs of the community in that part of the precinct.</p>	
OS3	<i>Open Space Type</i>	<i>Please provide a clear delineation showing which areas of proposed open spaces are required / proposed for stormwater purposes and which areas are proposed for recreation purposes (neighbourhood, suburb and sports park).</i>	<p>A clear distinction needs to be made in respect of the types of open space to be provided. For instance, drainage reserves should be shown as such on the precinct plan and should take into account existing or potential flood areas (reference the Wairaka Precinct SMP). Note, in that respect, that Figure 8.1 in the Applicant's Wairaka Precinct: Stormwater Management Plan prepared by MPS Ltd (part of the lodgement document bundle) shows a considerable reduction in flooding-affected areas. As part of the response to this RFI confirmation is sought that this accurately reflects the potential for flooding on proposed open space land that is identified as subject to flooding on the council's GIS so that the council can objectively assess its suitability for potential acquisition for open space purposes.</p>	
OS4	<i>Receiving environment</i>	Please demonstrate how the principles of the council's Open Space Provision Policy will be met with regards to preferred characteristics of neighbourhood parks including road frontage and visibility, flat areas, area for play and landscaping.	<p>The provided information will contribute into shaping a better understanding of the existing open space network and the necessity for it to expand or transform (change in number, size, and function). This will then enable a determination as to whether the capacity</p>	

			and the quality of the open spaces will be sufficient in the changing character of the area.	
OS5	<i>Adverse effects on open spaces</i>	The proposed increase in height of the buildings is beyond the permitted baseline of AUP. Please provide an assessment of the potential effects of adjoining development (including shading effects) and confirm how the effects on adjacent open spaces could be mitigated.	The adverse effect of the infringed height of the building on the open spaces including shadowing and visual dominance should be clarified, and mitigation possibilities outlined.	
OS6	<i>Open space relocation agreement under PC75</i>	Please clarify where the relocation of the key open space(private) from Mason Clinic Plan Change area (PC75) has been provided within Te Auaunga PC area.	During the processing of PC75, the applicant (ADHB) provided Auckland Council with a letter (dated 11 May 2021) of intentions relating to the loss of the identified key open space (private) land as a result of PC 75 (this letter has been provided to the applicant and should be included in the application documentation).  A clear indication is sought as to where and how the area and qualities of the area lost (including the amenity and ecological values) are to be replaced, mitigated or compensated.	
OS7	<i>Open space acquisition</i>	Please provide information as to how the applicant will mitigate for the additional height and population density that will be created as part of the proposed precinct.  Please clarify whether the applicant intends to mitigate for adverse effects created by proposing to vest some or all of the proposed open space at no capital cost or whether it expects financial compensation for some or all of the land.	According to precinct rules ... "financial contributions will be taken in accordance with the precinct rules in order to avoid, remedy or mitigate adverse effects of an activity on the environment. The precinct rules set out the purpose for which land may be required as a financial contribution, and the manner in which the level of contribution (i.e. the amount of land required) is determined".  No information has been provided by the Applicant of its expectations for compensation for the proposed open space areas.  This information is essential to help determine the feasibility of proposed open spaces being acquired by the council (noting that – apart from drainage reserve	

			that vest at no capital cost through the resource consenting process – all open space acquisitions are subject to political approval whether being proposed to vest at no capital cost or purchased).	
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**Non CI23(1) Matters – Proposed Plan Change Provisions**

OS8 It would be helpful to provide an area comparison of the open space (private and public) indicated in the current Wairaka Precinct Plan with the area proposed in the revised precinct plan. Ideally, this comparison would be broken down into drainage, ecological, passive and active open space categories.

**LANDSCAPE** (Specialist: **STEPHEN BROWN** 021 646181 [stephen@brown.co.nz](mailto:stephen@brown.co.nz))

<p>L1</p>	<p><i>Assessment of Visual &amp; Landscape Effects: Visual Effects Assessment Methodology</i></p>	<p>Please provide an analysis of the existing character and values associated with each viewpoint (including the additional viewpoints as requested below) - taking into account the context afforded by the AUP, PC78 and other statutory instruments - before assessing the effects of the Plan Change on them. This should be a clear two-stage process.</p>	<p>BML's assessment addresses effects on individual receiving environments and audiences via its assessment for individual viewpoints but intermixes its description of the current situation with that anticipated under the Plan Change and related effects. It is very difficult to decipher what the proposed visual changes would mean in terms of effects on both the public and (neighbouring) private domain. Furthermore, Te Tangi a te Manu (para.s 6.12 to 6.16) states that "<i>Landscape Effects are to be assessed against existing landscape values and relevant provisions, exploring existing character and values as precursor to identifying effects - at the relevant spatial scale and in the context of relevant statutory provisions and other matters</i>". It also states (para.s 6.08-6.09) that:</p> <ul style="list-style-type: none"> <li>• visual effects are a sub-set of landscape effects,</li> <li>• that landscape values take into account physical, associative and perceptual dimensions, and</li> <li>• visual values include the interpretation of how views and outlook are understood, interpreted and what is associated with it.</li> </ul> <p>It is further stated that (para.6.09) "<i>A pitfall is to superficially treat visual effects as mere visibility or changes to a view rather than the implications for the landscape values experienced in the view.</i>"</p> <p>BML's assessment appears to fall into the 'pitfall' just described, with little real analysis of what the changed heights would mean in terms of effects on the characteristics and values of the various urban landscapes found around the Plan Change site. As such, it is important to provide an assessment of those existing characteristics and values – for each</p>	
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			viewpoint – before than assessing the effects that the Plan Change would have on them.	
L2	<i>Additional Landscape / Visual Viewpoint Assessments - Woodward Road</i>	Please provide an additional assessment Viewpoint and related photo simulations that address views across the Plan Change site from closer to Woodward Road (see <i>Figure 1 below</i> ).	<p>Figure 1 and VS1-7 address only the lower end of Carrington Rd, not development to increased heights down most of its length. Although VS7 addresses the relationship of MHU development to Height Area 4 (in particular) the relationship of that same Height Area to the (proposed) THAB Zone further south along Carrington Rd is still relevant to the assessment of effects.</p> <p>The elevated and 'introductory' nature of views across the site from near Woodward Road mean that this part of Carrington Rd is particularly important in terms of public interaction with future development across it.</p>	



Figure 1. Carrington Rd Near Woodward Avenue

L3	<i>Additional Landscape / Visual Viewpoint</i>	Please provide an assessment of effects which addresses this additional viewpoint(s): on Carrington Road.	The fuller range of landscape and visual effects experienced by those living on Carrington Road and travelling down it still need to be assessed – as described above.	
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	Assessments – Carrington Road			
L4	Additional Landscape / Visual Viewpoint Assessments - Great North Road / Te Auaunga Shared Path	Please provide additional assessment Viewpoints and related photo simulations and an assessment of effects that address views across Te Auaunga towards the Plan Change site from Great North Road, the Te Auaunga Cycleway / Walkway and the cycleway / bridge over Oakley Creek (see Figures 2 and 3 below).	Although VS3 and VS4 address views from Great North Road and the cycleway overbridge near the motorway interchange towards the Plan Change site, they both focus, almost exclusively, on development within Height Areas 1 and 2. There is no assessment in respect of views from Great North Road and the Te Auaunga cycleway / walkway to the east – towards development within Height Areas 2 and 4 beyond Oakley Creek.  The fuller range of landscape and visual effects potentially visited on Te Auaunga and the Oakley Creek Reserve still need to be addressed – relative to those using the cycleway / walkway and Great North Road, as well as the large catchment of Waterview residents who live near these thoroughfares and open space.	



Figure 2. Te Auaunga Walkway / Cycleway Looking to the East



L5	<p><i>Additional Landscape / Visual Viewpoint Assessments - Pt Chevalier Town Centre</i></p>	<p>Please provide a new visual simulation that captures views from the Pt Chevalier Town Centre towards Oakley Hospital and Building Height Areas 1 and 2 (see <i>Figures 4 and 5 below</i>).</p> <p>Please also provide an assessment of effects that addresses the interaction between the Town Centre and Plan Change development via a viewpoint as described above.</p> <p>NB: The response to this RFI may be combined with the RFI in H1.</p>	<p>The photos and simulations provided for Viewpoints 5 and 6 are not from the core town centre area and don't capture the interrelationship of potential future development with that which exists within the Town Centre. Furthermore, the images prepared for Viewpoint 6 are truncated, both vertically and horizontally. A revised Viewpoint 6 – located within the Town Centre – would more appropriately capture the interplay of Pt Chevalier's centre with the development proposed in Height Areas 1 and 2), as well as the interaction between that development and the historic Oakley Hospital Building.</p> <p>The fuller range of landscape and visual effects associated with the interaction between Pt Chevalier's Town Centre and development within the Plan Change site still need to be assessed. This could be achieved via relocation of BML's Viewpoint 6, as described above.</p>	
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Figure 4. The Pt Chevalier Town Centre on Great North Road



Figure 5. The Pt Chevalier Town Centre at the Intersection of Great North Road and Pt Chevalier Road

L6	Assessment of Visual & Landscape	Please provide an assessment of the effects associated with overlooking on the Mason Clinic.	It is stated at p.14 that "The taller buildings in this location (Height Area 1) will look out and well over the top of the Mason Clinic ..." and refers to "the avoidance of dominance and / or amenity effects	
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	<i>Effects: Landscape Effects</i>		<i>particularly on direct neighbours". Height Areas 1 and 2 are located directly adjacent to the Mason Clinic and its internal courtyards, it is unclear if the taller development within those areas (especially Height Area 1) could / would impact on the Mason Clinic and its occupants – including on their privacy.</i>	
L7	<i>Assessment of Visual &amp; Landscape Effects: Landscape Effects</i>	<p>Please provide an analysis of those factors, within Height Area 1 (in particular, that that would render development at the additional height sought being either appropriate or conceivably inappropriate in landscape terms – in terms of:</p> <ul style="list-style-type: none"> <li>• its location,</li> <li>• surrounding landforms, vegetation patterns and development,</li> <li>• surrounding zoning and</li> <li>• the relationship with the Oakley Hospital Building?</li> </ul>	<p>At p.15 of BML's assessment, it is stated that "<i>there is nothing inherently inappropriate, in urban landscape terms, about the additional height sought above that already enabled ...</i>" – focusing on Height Area 1. However this begs the questions, are there any factors that make it inherently appropriate from a landscape standpoint? Without such evaluation, there is a possible implication that the higher development within Height Area 1 (in particular) has been 'pre-judged' to some degree.</p>	
L8	<i>Heritage Impact Assessment: Outline of Plan Change</i>	<p>Please provide details about the RDA Assessment Criteria referred to in p.4 of the RDA Architects' assessment: "<i>Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in section 1334.8 Assessment – Restricted Discretionary Activities.</i>"</p>	<p>DPA Architects' heritage assessment appears to rely on these criteria to ensure a degree of compatibility between the Oakley Hospital Building and future development within Height Area 1 (especially). However, at present those Assessment Criteria only go so far as to include:</p> <ul style="list-style-type: none"> <li>(k) <i>the effects of the design, appearance and impact of all buildings and structures including elements of height, architectural treatment of building façade and overall scale on the amenity values of the natural and physical landscape;</i></li> <li>(l) <i>long building frontages are visually broken up by façade design and roofline, recesses, awnings, balconies and other projections, materials and colours;</i></li> </ul>	

			Neither these, nor any other, criteria within section 1334.8 appear to address the relationship between development within Height Area 1 and the Oakley Hospital Building. Although proposed Policy 1334.3(4)(i) also requires <i>"the identification and protection of significant landscape features, the adaptation of the scheduled historic buildings, identified trees and integrated open space network"</i> , this also fails to address the relationship between heritage buildings and new development.	
L9	<i>Plan Change: Policies 1334.3 Integrated Development</i>	Please explain how a 10m setback against Te Auaunga would achieve effective integration of new development within Height Area 1 and the adjacent Te Auaunga / Oakley Creek Reserve.	Given that development within Height Area 1 could attain 72m and would sit on land elevated above most of Te Auaunga, it is important to know how the 10m setback would provide effective mediation between that Height Area and the reserve land.	
L10	<i>Plan Change Standards: 1334.6.11.1 Maximum Tower Dimensions:</i>	Please explain why no maximum tower dimension is stipulated for development up to 35m high, given that this still comprises development up to 13 storeys high within Height Area 2 and effectively controls development across most of the PC site.	Height Areas 2 and 4 cover most of the PC site, so that the future streetscapes and built form landscape of the site will be largely determined by development within those areas. In effect, the more qualitative outcomes across the precinct will be reliant on the controls applicable to those two Height Areas. In addition, there could be significant height and building coverage variations across the Precinct, so that controls over the form of lower towers may still be required.  Consequently, some justification for the absence of any Maximum Tower Dimension standard for development up to 35m high is considered necessary.	
L11	<i>Plan Change: 1334.8.1(1B) RDA Matters of Discretion</i>	Please explain how over-height development would be assessed under Criteria (1B)(b)(i) in terms of Tamaki Makaurau's <i>"cityscape"</i> ?	The term <i>"cityscape"</i> is so wide-ranging that it could be meaningless. It could conceivably relate to everything from the landforms and cones of the Auckland Isthmus to the mantle of bush and landforms focused on Te Auaunga, or the cluster of structures around the Great North Rd / North-western	

			<p>Motorway interchange and Pt Chevalier centre. It could also refer to the mixture of MHS, MHU and Town Centre Zones found around the PC site.</p> <p>Consequently, the outcome of such assessment would entirely depend on the scale and scope of the context identified and evaluated. Notably, however, there is no reference to the Pt Chevalier Town Centre or the Oakley Hospital Building – which are both important in terms of public perception of the Pt Chevalier / Te Auaunga area.</p>	
L12	Plan Change: I334.8.1(1B) RDA Matters of Discretion	Please explain why a new landmark is required under Matter of Assessment (1B)(b)(i), next to Pt Chevalier and Te Auaunga, when the Oakley Hospital Building is already a long established 'landmark' that is significant in relation to Pt Chevalier's identity and sense of place.	Given that the Oakley Hospital Building is already a public landmark, is there any need for a (potentially) competing landmark that might degrade the very same values associated with the current heritage building.	
L13	Plan Change: I334.8.1(5) RDA Matters of Discretion	<p>Please explain why Matter of Assessment (5)(d)(iv) addressing buildings that are over-height limits the assessment of effects to effects on the "amenity values of open spaces and adjoining residential areas." This does not consider effects on:</p> <ul style="list-style-type: none"> <li>• Local streetscape values;</li> <li>• The natural values of Te Auaunga;</li> <li>• The Town Centre character and identity of Pt Chevalier; or</li> <li>• The heritage values of the Oakley Hospital Building.</li> </ul>	Excessive height has the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.	
<b>Non CI23(1) Matters – Proposed Plan Change Provisions</b>				
L14	Plan Change: Policies I334.3 Built	It is noted that Policy (14) under Built Form does not address the issue of a sympathetic relationship between new development and the scheduled, Oakley Hospital Building.	Providing some form of sympathetic relationship between the Oakley Hospital Building and new development within Height Area 1 (especially) appears to be fundamental to the findings in the	

	<i>Form and Character</i>		DPA Architects' heritage assessment and also appears to influence – to a lesser degree – the findings in BML's report. However, it will be difficult to achieve such positive engagement without directly applicable policies.	
L15	<i>Plan Change: Policies I334.3 Built Form and Character</i>	The heights and built forms proposed within Height Area 1 are exceptional in all respects. It is noted that Policies (11) to (14B) under Built Form do not reflect this 'exceptionality' in terms of the built form outcomes to be achieved within that Height Area.	Given the prominence of the 'towers' anticipated within Height Area 1 and their very significant deviation from the height standards associated with the Town Centre, MHU and THAB Zones nearby, they should ideally be of a design standard that reflects their 'exceptionality'. In effect, their design qualities should be more than just of a 'high quality' (14) to justify the increased heights that can be achieved within Height Area 1. However, the current policies do not appear to reflect such an approach.	
L16	<i>Plan Change: Policies I334.3 Built Form and Character</i>	It is noted that Policies (11) to (14B) under Built Form do not address the issue of achieving high quality built forms within Height Area 2 near Carrington Road and visual sympathy or compatibility with development in the MHU and THAB Zones across that road corridor.	There are likely to be significant built form disparities between the 10-11 storey development anticipated within Height Area 2 and that which can occur (as of right) in the THAB and MHU Zones across Carrington Road. Consequently, the achievement of high quality design and built forms that are sympathetic to that within the 'lower' THAB and MHU Zones would seem central to achieving high quality streetscapes and a high quality urban landscape. However, this important relationship is not addressed in the current Built Form policies.	
L17	<i>Plan Change: Policies I334.3 Pedestrian &amp; Cycle Access, Street Quality &amp; Safety</i>	It is noted that Policies (17) to (19) do not address integration of the Plan Change site's streets, pedestrian thoroughfares and cycleways with the North-western Cycleway, the Great North Rd / Te Auaunga Cycleway / walkway, Carrington Rd and Phyllis Street Reserve.	The Plan Change site is highly connected to a range of walkways, cycleways, reserves and key roads at present. These connections contribute very appreciably to both local and regional use of the local area, and the local area's amenity. Consequently, these connections need to be maintained and this should be reflected in the relevant PC provisions.	
L18	<i>Plan Change: Policies I334.3</i>	It is noted that Policies (17) to (19) do not address streetscape values, both within the	The provision of high quality streetscapes is fundamental to the increased development intensity	

	<i>Pedestrian &amp; Cycle Access, Street Quality &amp; Safety</i>	Precinct and on its margins – notably down Carrington Road.	and more elevated building heights proposed – both in terms of urban character / aesthetics and functionality. However, the achievement of such qualities is not addressed at present. In my view, this matter is fundamental to achieving a high quality urban environment and should be addressed in this section.	
L19	<i>Plan Change: I334.8.1(1B) RDA Matters of Discretion</i>	<p>It is noted that the Matters of Assessment for over-height buildings do not address such matters as:</p> <ul style="list-style-type: none"> <li>• Effects on the A13 Volcanic Viewshaft;</li> <li>• Visual over-dominance;</li> <li>• Over-shadowing outside the Equinox periods;</li> <li>• Effects on privacy;</li> <li>• The streetscapes of Great North Road, Carrington Rd and the Pt Chevalier centre;</li> <li>• Effects on the MHS and MHU Zones south and east of the PC site;</li> <li>• Effects on Te Auaunga; and</li> <li>• Effects on the heritage values of the Oakley Hospital Building.</li> </ul>	The assessment criteria for breaches of the Height Controls are effectively the same as for those that comply with the proposed height controls. As such, they mostly address matters applicable to the internal qualities of the PC site and fail to address potential effects that are fundamental to the manner (and degree) to which development across the PC site would 'fit into' its wider surrounds and landscape setting.	
L20	<i>Plan Change: I334.8.1(5) RDA Matters of Discretion</i>	<p>It is noted that Matter of Assessment (5)(d)(vi) addressing buildings that fail to meet the precinct boundary set back control limits the assessment of effects to "neighbouring sites, building scale and dominance (bulk and location), and outlook and privacy." This does not consider effects on the wider public domain, including local streetscapes, the town centre and Te Auaunga.</p>	Breaches of the precinct boundary set back have the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.	

L21	<i>Plan Change: I334.8.2(1B) RDA Assessment Criteria</i>	It is noted that over-height development is proposed to be assessed against Policies I334.3 (14A) & (14B) which actively support 'taller buildings', rather than providing a foundation for critical evaluation of such structures.	Policies I334.3 (14A) & (14B) provide clear support for exceptionally tall built forms. However, they do not address the degree of 'fit' that such proposals would have in relation to their surrounds (and existing development, such as the Oakley Hospital Building) or the effects that they might generate.	
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<b>ECOLOGY</b> (Specialists: Biosearches - <b>CHRIS WEDDING</b> (terrestrial) 027 4795418 <a href="mailto:Chris.wedding@biosearches.co.nz">Chris.wedding@biosearches.co.nz</a> <b>TREFF BARNET</b> (freshwater and coastal) 021 2854330 <a href="mailto:Treff.barnett@biosearches.co.nz">Treff.barnett@biosearches.co.nz</a> )			
E1	Terrestrial ecosystems	Please provide a map identifying the spatial extent and area (m <sup>2</sup> ) of vegetation types, streams and wetlands.	Ecological values are not clearly identified.
E2	Terrestrial ecosystems	Please provide fuller descriptions of the diversity (flora and fauna communities) and structure (canopy, subcanopy, ground cover) of identified areas of ecological value and categorise, where appropriate, in accordance with Auckland Council's indigenous ecosystem types (e.g e.g. WF4, WF8, Singers et al. 2017).	We consider the values assessment is currently incomplete. We support the use of EIANZ (2018) guidelines to assess ecological values as referenced in the Morphem Ecological Impact Assessment (EclA). However, the EclA only provides a brief summary of all vegetation communities combined, as aggregated in Table 1 of the EclA. Without an assessment of the value of individual areas or ecosystem types, the EclA potentially conceals higher values that may be present within the proposed Plan Change area.
E3	Terrestrial ecosystems	Further to E2 (above), please provide commentary on the potential presence of rock forest with descriptions of substrate where vegetation cover is mapped in RFI E1 (above).	Rock forest is a rare ecosystem type and is known to occur within the immediately surrounding landscape, including at the mouth of Te Auaunga / Oakley Creek.
E4	Terrestrial fauna	Please provide an updated database review of indigenous bird species to account for potential and intermittent presence of At Risk or Threatened species, particularly aquatic species around the wetland, where vegetation will have matured since the Boffa Miskell assessment. Please also provide commentary on the effects of the proposed plan change on any additionally identified species, with respect to urban intensification, increased building height and reduction in extent of open space.	Potential values are not clearly identified.

E5	<i>Terrestrial fauna</i>	Please justify why the likelihood of bat roosting habitat is considered 'negligible' if potential roost habitat along Te Auaunga is considered to hold potential and given that native bats have very large home ranges. Further, if potential bat habitat is acknowledged as possible within the precinct, please comment on the potential effects of the plan change, including urban intensification (including increased light levels, building height) and reduction in open space on access by bats to potential foraging, flight and roost habitat (e.g. mature tree groves), noting that bats use open spaces and wetlands and other water bodies.	Potential values and effects are unclear.	
E6	<i>Wetlands</i>	Please provide evidence to illustrate that both of these wetlands individually are classified as "a deliberately constructed wetland", and therefore are excluded from the definition of "natural inland wetland" as defined in the NPS-FM.  Update Map in Appendix 1 of the Ecological Report accordingly.	The 'central wetland' and upper wetland to the 'central wetland' form part of the natural stream system and appear to be natural inland wetlands.  Policy 6 of the National Policy Statement for Freshwater Management 2020 (NPS-FM) states that "There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted".	
E7	<i>Wetlands</i>	Map and describe the natural wetland referred to in the ecological report at the confluence with Te Auaunga.  Please update Map in Appendix 1 of the Ecological Report accordingly.	Location of the wetland is not mapped or delineated. Insufficient information with regard to Policy 6 (as above).	
E8	<i>Wetlands</i>	Please provide a description of the habitat immediately above the Coastal Marine Area (CMA), with an assessment against the	Insufficient information with regard to Policy 6 (as above).	

		criteria of a natural inland wetland (as set out in the NPS-FM).		
E9	Streams	Please provide a map of the section of Wairaka Stream that has been / is proposed for daylighting.  Update Map in Appendix 1 of the Ecological Report accordingly.	New consented stream length (daylighted) should be clearly shown to ensure the plan change retains the full protection of the Wairaka Stream and its environs, including providing for appropriate riparian yard setbacks as stated in the planning report.	
E10	New Zealand Coastal Policy Statement 2010	Please provide an assessment of the Plan Change Request against the NZCPS, including an assessment of effects on the Significant Ecological Area – Marine, immediately adjacent to the site.	Section 75 of the RMA states that a district plan must give effect to the New Zealand Coastal Policy Statement (NZCPS). As the Plan Change area is located within the coastal environment, the provisions of the NZCPS are relevant matters for consideration for a Plan Change Request.	

**ECONOMIC EFFECTS** (Specialist: **SUSAN FAIRGRAY** Fairgray Economics 027 633 2970 [susan@me.co.nz](mailto:susan@me.co.nz))

EA1	<i>Retail assessment</i>	<p>Please provide an expert's assessment of the appropriate level of retail space and distribution within the precinct, including the proposed supermarket.</p> <p>NB: The response to this question may be combined with the RFI in UD6.</p>	<p>There has been a sizeable increase in the proposed number of dwellings (and their location) since the earlier retail assessment that informs the existing retail caps. It is important to understand what level of retail activity would adequately serve the likely future residents (and other retail demand arising within the precinct) and be appropriate within the context of the surrounding urban centres hierarchy. It is important this takes account of any updated yield information (see Planning P1 below). Changes to the appropriate spatial distribution of retail within the precinct (from the previous assessment) may occur as a result of both changes to the proposed distribution of land uses within the precinct as well as increases to the overall dwelling scale (and consequent retail demand).</p>	
EA2	<i>Other Commercial Activity Assessment</i>	<p>Please provide an expert's assessment of the likely level and take up of other commercial activity within the precinct and its alignment with Auckland's intended pattern of business growth.</p>	<p>This is important to understand the likely level of other (non-retail) business development within the precinct and how this aligns with Auckland's intended patterns of business growth. This includes understanding the projected uptake of business capacity provided within the precinct. Other business activity enabled within the precinct may also overlap with the types of activities locating within the surrounding urban centres hierarchy. Employees and businesses within the other (non-retail) business activity will also generate additional demand for retail, hospitality and services within the precinct.</p>	

<b>TRANSPORT</b> (Specialist: <b>ANDREW TEMPERLEY</b> Traffic Planning Consultants 021 0221 3469 <a href="mailto:andrew@trafficplanning.co.nz">andrew@trafficplanning.co.nz</a> )			
T1	Trip Generation	<p>With reference to ITA Section 5.8 and Appendix E please provide evidence to confirm consistency of the new heights proposed under the PC with trip generation assumptions in the ITA, including correlation between building height and gross floor area / development yield, and in turn, trip generation.</p> <p>Please also provide an alternative higher trip generation scenario, in the event that higher development yields could be achieved under the new permitted height limits (see Planning P1 below).</p>	<p>The AEE / Section 32 Report refers to areas within the precinct where increased height is to be permitted, to in turn enable additional growth. However, it is not clear as to how this has informed the assessment of trip generation potential within the ITA, in Section 5.8 and Appendix E, with regards to correlating increased building heights with corresponding increases in gross floor area, numbers of residential apartments and other related land-use metrics.</p> <p>Further analysis of the correlation between building heights, development yield and consequent trip generation potential is therefore considered appropriate in order to understand the full potential longer-term transport effects of the proposal.</p> <p>Please note that this analysis should be informed by any updated yield information as a result if RFI P1 below.</p>
T2	Trip Generation	<p>Please provide further clarity for the choice of trip rate reductions cited in section 5.8.2.1 of the ITA, namely:</p> <ul style="list-style-type: none"> <li>• 10% reduction in tertiary education Trip Rates, based on 'likelihood of remote learning'</li> <li>• 30% reduction in tertiary education trips), due to behavioural change influenced by network congestion</li> </ul> <p>And similarly for the choice of trip rate reduction cited in section 5.8.3.3:</p>	<p>In the absence of reasonable evidence to support the proposed reductions, and confirmation of their agreed use with the Road Controlling Authority (AT), it is not possible to verify that a fair and robust assessment of trip generation and transport network performance has been undertaken.</p>

		<ul style="list-style-type: none"> <li>25% reduction in residential trip rates in the North-west, northern and Carrington Zones, due to congestion driving a stronger mode shift (compared to 20% agreed with AT)</li> </ul> <p>The above percentage reductions should be supported by appropriate quantitative evidence, for example, in relation to the impacts of remote learning on education trip generation, or the influence of severe congestion on encouraging modal shift.</p> <p>Please also confirm whether these percentage reductions been agreed with AT.</p>		
T3	<i>Southern Road Connections to Precinct</i>	<p>Please assess options for southern connections to the Precinct (via Laurel Street / Renton Road / Rhodes Avenue), but with access limited to walking and cycling and potential public transport use.</p>	<p>While any vehicular access via Laurel Street, Renton Road and Rhodes Avenue would require a change to Wairaka Precinct Rule I334.3(26), which currently precludes direct vehicle access to and from the south, an arrangement allowing for access limited to use by sustainable modes of travel could contribute toward strategic aims to achieve modal shift.</p> <p>The ITA references a previously considered 'back route' bus service following the north-south spine and looping via Carrington Road at both ends of the Precinct, which AT previously did not support due to slow service speeds compared to Carrington Road.</p> <p>However, a potential variation to this proposal could include a re-routing of such a bus service via a new bus-only link to the south of the Precinct, which would provide buses with the advantage of a shorter-distance route compared to general traffic.</p> <p>The ITA acknowledges previous consideration towards additional access to the Precinct from the south, and while it confirms that the arterial road network to the southeast of the precinct is currently not forecast to experience significant congestion</p>	

			issues which would warrant new road connections, a bus service serving the main spine road through the Precinct could have wider-spread benefits for trips generated within the Precinct.	
T4	Railway Level Crossing (Woodward Road)	Please provide an assessment based on the Woodward Road Level Crossing not being removed.	<p>The Table in Section 4.9 'Summary of Transport Assumptions' assumes completion of the Level Crossing Removal in all modelled scenarios. It is uncertain at this stage what the timing of those works would be (updates from KiwiRail / AT would be beneficial in that respect).</p> <p>In the event that this work does not take place by the time of completion of Plan Change development and other transport proposals, an analysis should be provided of the level of operational effects on the adjoining road network.</p> <p>Further detail on this proposal would be beneficial for background context and understanding the timing and nature of adverse effects on the adjoining road network. Possible considerations could include development staging to align with the Rail Crossing works being completed and construction works being timed to avoid the construction phase of Carrington Road corridor improvements.</p>	
T5	Triggers for Transport Improvements and Interventions	Please provide a schedule of transport improvements and interventions with 'trigger points' in the form of development milestones (e.g. nos. dwellings, completion of other land use activities), at which particular improvements are deemed to be required. Please also include anticipated timescales based on latest information available.	<p>While Section 4.9 of the ITA lists Transport Assumptions and interventions included in the traffic modelling scenarios, many of these are notably dependent on other parties for funding and delivery, such as the Carrington Road upgrade works to be delivered by AT.</p> <p>Following recent discussions with AT, it is understood that the timeline for delivery of the Carrington Road improvements is subject to ongoing uncertainty and may extend beyond the horizons assumed for the traffic modelling scenarios (of 2024 and 2028 for Scenarios A and B respectively).</p>	

			<p>Trigger points for individual transport improvements according to levels of development completed may ultimately be seen as more appropriate, to ensure that transport effects will be mitigated in a timely manner.</p> <p>It is also appropriate to revisit the traffic modelling scenarios with regard to the assessment years and particular improvements assumed in each scenario, in the event that the full package of Carrington Road improvements cannot be delivered by the respective time horizons.</p>	
T6	<i>Shared Path Connection</i>	Please update the proposed Precinct Plan to show a shared path connection in the northern part of the precinct, to replace the linkage lost through proposed PC75.	It is understood that consideration has been given to an alternative shared path route. This should be illustrated on the Precinct Plan for consideration. Note that the intention to replace this path was referred to in the 11 May 2021 MHUD letter (see also OS6 above).	



H1	Oakley Hospital Main Building	<p>Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further visual simulation viewpoints that show the (full extent) of the proposed and operative enabled new development within the context of the Oakley Hospital Main Building from:</p> <ul style="list-style-type: none"> <li>• the Point Chevalier Town Centre (Figure 1); and</li> <li>• Carrington Road (south of the motorway bridge) (Figure 2).</li> </ul>	<p>These are additional key views of the Oakley Hospital Main Building as experienced in the local landscape. The request has also been guided by the following statements in the HIA (p.5):</p> <p><i>"A distant view of the Former Oakley Hospital Building can still be had from the Point Chevalier shops and the building is also visible from Carrington Road. These views of the buildings and the landscaped area in front of the building will not be affected by the Plan Change."</i></p> <p>From the western edge of Point Chevalier Town Centre, the symmetrical frontage of the scheduled building is captured (compared to existing viewpoints VS5 and VS6); and from Carrington Road (heading south), views of the building within its immediate garden setting (EOP) are experienced.</p>	
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Figure 1: The Oakley Hospital Main Building viewed from the western edge of Point Chevalier Town Centre.



Figure 2: The Oakley Hospital Main Building and front garden viewed from Carrington Road.

H2	Oakley Hospital Main Building	Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further (or annotated) visual simulations that show the height of new buildings as enabled in the operative precinct plan.	To assist in determining the potential visual/dominance impacts generated by the proposed new development relative to that currently enabled in the operative precinct plan.	
H3	Oakley Hospital Main Building	<p>Please provide a detailed assessment of effects (including cumulative effects) of the entire PPC on the historic heritage values of the Oakley Hospital Main Building.</p> <p>Heritage-related AUP RPS objectives and policies, including B2.3.2.(1)(a); B5.2.1.; and B5.2.2.(6-8), are relevant to this assessment. Please also consider within the context of the building's conservation plan<sup>1</sup> and heritage assessment<sup>2</sup>.</p>	<p>The HIA acknowledges that:</p> <p><i>"...the enabled development will <b>potentially impact</b> the heritage values of the former hospital." (p.4) and "...any new buildings, and particularly those of additional height, <b>will have an impact</b> on the heritage values of the Former Oakley Hospital." (p.6) (emphasis added).</i></p> <p>However, the level and extent of this impact on the historic heritage values (particularly aesthetic (incl. landmark) and context values) of the Oakley Hospital</p>	

<sup>1</sup> Former Carrington Psychiatric Hospital: A Conservation Plan, prepared by Salmond (now Salmond Reed) Architects, 1995.

<sup>2</sup> Unitec Institute of Technology Former Carrington Psychiatric Hospital: A Heritage Assessment, prepared by DPA Architects, May 2014.

			<p>Main Building and on its overall significance as a Category A historic heritage place, is unclear.</p> <p>Furthermore, focus is currently placed on the impact generated by development in Height Area 1, with less mention of impacts (including cumulative impacts) of increased building heights across the precinct, particularly in Height Areas 2 and 4, which are in similarly close proximity to the scheduled place.</p>	
H4	Oakley Hospital Main Building	<p>The HIA states (p.5):</p> <p><i>"...locating buildings of additional height in an area in the north west...will result in the least impact on the heritage values to the scheduled building."</i></p> <p>Please explain why this is considered to be the case.</p>	<p>The location of the buildings of additional height in the site's northwest corner (Height Area 1) means that they will be located adjacent to and viewed within the immediate context of the Oakley Hospital Main Building. Given the proximity of Height Area 1 and the considerable increase in building height sought, it would seem that this location has the potential to result in the greatest (rather than the least) visual impact on the scheduled building's historic heritage values.</p> <p>It is therefore important to understand what has informed this critical statement.</p>	
H5	Oakley Hospital Main Building	<p>Please clarify what aspects of the PC are considered mitigating factors from a built heritage perspective.</p>	<p>The HIA incorporates a section titled 'Mitigating Factors' (p.5), however, it is not entirely clear what these factors are considered to be.</p> <p>Given the significant changes envisioned by the PPC and the resultant potential for visual dominance effects, it is important to understand what measures are considered to mitigate effects on both the scheduled Oakley Hospital Main Building and the precinct's broader historic landscape.</p>	
H6	Plan Change Provisions	<p>The HIA states (p.4):</p> <p><i>"Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in</i></p>	<p>Section I334.8.1.(1A)(b) Assessment – RDA, Matters of Discretion – 'Building form and character' provides several assessment criteria, none of which appear to have regard to the effects of the new development on the historic heritage values of the Oakley Hospital</p>	

		<p>section 1334.8 Assessment – Restricted Discretionary Activities.” and</p> <p>“Any new buildings within Height Area 1 should be positioned and orientated having regard to their impact on the heritage values of the Former Oakley Hospital Building.”</p> <p>Please clarify which assessment criteria have been relied on and if (or how) the provision sought in the HIA has been meet.</p>	<p>Main Building. It is therefore unclear what assessment criteria have been relied upon in the HIA and if they are considered to appropriately safeguard and manage the heritage values of the scheduled building.</p> <p>It is noted that the HIA seeks that new buildings be ‘positioned’ and ‘orientated’ to have regard to their impact on the heritage values of the Oakley Hospital Main building, but this does not appear to have been incorporated into the new precinct provisions. It would be beneficial to understand whether this has a bearing on the HIA findings.</p> <p>Note: See also issue raised below in relation to the sufficiency of the provisions proposed.</p>	
H7	Plan Change Provisions	<p>Please explain why reference to the scheduled building has been removed altogether from existing provision 1334.3.(14).</p>	<p>It is not clear why this reference has been deleted.</p> <p>Note: See also issue raised below in relation to the sufficiency of the provisions proposed.</p>	
H8	Plan Change Provisions	<p>Proposed policy 30A states:</p> <p>“Encourage the adaptive re-use of the existing buildings with historic value for retail activity.”</p> <p>Also relevant is existing Policy 11, which states:</p> <p>“Encourage the retention and adaptation of the heritage and character buildings, and elements identified within the precinct.”</p> <p>Please provide further details about which existing buildings are being referred to here and (in relation to Policy 30A) how their historic value has been/will be determined.</p>	<p>There are several existing (late nineteenth and early twentieth century) buildings within the Te Auaunga Precinct that have a strong association with the historical development of the hospital site, contribute to its sense of place, and have potential (or known) historic heritage values. This includes the Pump House (which is understood will be protected via restrictive covenant). These buildings are both broadly and more specifically acknowledged in a number of the PPC supporting and background documentation.</p> <p>DPA’s HIA positively references how “policies are included [in the precinct provisions] to encourage the retention and adaptation of heritage buildings on the site including the Former Oakley Hospital.” (p.6)</p>	

		<p>Once identified, please advise what further provisions will be put in place to ensure appropriate outcomes for these buildings (including the Pump House) in the context of the PPC.</p>	<p>Boffa Miskell's Assessment of Landscape and Visual Effects goes further by identifying 'key buildings and features' on the site (Figure 4, p.7).</p> <p>CFG Heritage's Archaeological Assessment (Carrington Backbone Works project) also identifies several historic buildings associated with the early hospital site.</p> <p>At this stage, the identity of the 'heritage and character buildings' and 'existing buildings with historic value' referred to in the policies are uncertain. To provide greater clarity and avoid confusion in the application of the policies, it would be helpful to have these buildings clearly set out in the precinct plan (in a similar way to trees). There is also the question of whether the objectives, policies and assessment criteria should go further in acknowledging these key features in the precinct's landscape – e.g. Objective (I334.2.(6); Policy I334.3(4)(i).</p>	
<p><b>Non CI23(1) request matter/other comments</b></p>				
<p>H9</p>	<p>It is noted with concern that the proposed plan change provisions give little weight to historic heritage and do not enable greater consideration and assessment to be given to the effects of new development on the historic heritage values of the Oakley Hospital Main Building. – see, for instance I334.3.(14) Policies – Built Form and Character; I334.8.1.(1B) Assessment RDA - Matters of Discretion; I334.8.1.(5)(d)(iv) Assessment RDA - Matters of Discretion; I334.8.2.(1A)(b)(i) Assessment RDA – Assessment criteria and I334.8.2.(1B)(a) Assessment RDA – Assessment criteria.</p> <p>The Oakley Hospital Main Building is a Category A historic heritage place of outstanding significance well beyond its immediate environs (AUP) and a Category 1 heritage place of special or outstanding historical or cultural significance (HNZPT). It has stood as a distinctive and recognisable landmark in the local landscape for over 150 years. Its landscape qualities are noted in its conservation plan as such:</p> <p>“The former hospital building is a major local landmark and dominates its immediate setting. It is of regional importance that existing views and the landmark significance of the building remain unaffected by external changes and internal developments.”</p> <p>Ensuring that the PPC is considered within the context of this significant heritage place and enabling its heritage values to be appropriately protected and managed (as directed in RPS B5. objectives and policies) is therefore considered to be imperative. This cannot be achieved if the precinct provisions neglect to require proposals to be sympathetic to adjacent</p>			

<p>historic heritage and fail to enable greater consideration and assessment to be given to the relationship between the new development and the Oakley Hospital Main Building.</p> <p>It is noted that more targeted historic heritage policies and criteria, together with tailored design guidelines, are included in other precincts that enable/have enabled the large-scale (residential) development of sites with heritage values (e.g. Hobsonville Point, Kingseat).</p> <p>The applicant is encouraged to propose more appropriate provisions to recognise this issue.</p>		
H10	<p>As the Oakley Hospital Main Building is included on Heritage New Zealand Pouhere Taonga's List as a Category I place (and the precinct likely determined a pre-1900 site), it is considered beneficial to engage with HNZPT (if not already done so) and seek their views at this early stage of the PPC process.</p>	
H12	<p>It is noted that the scheduled Oakley Hospital Main Building is currently unoccupied and due to the lengthy timeframes anticipated for the staged redevelopment of the precinct, there is concern that the building is at risk of vandalism and/or falling into a state of disrepair. Whilst it is acknowledged that the PC has the potential to positively enable new opportunities to support adaptive reuse (including earthquake strengthening), there is no clear understanding of when this might occur. From a good practice conservation standpoint, understanding what commitment has been made to utilise this significant heritage place and safeguard its historic fabric in the short to medium term is important.</p>	
<p><b>HISTORIC HERITAGE (Archaeology)</b> (Specialist: <b>REBECCA RAMSAY</b> 021 848 721 <a href="mailto:rebecca.ramsay@aucklandcouncil.govt.nz">rebecca.ramsay@aucklandcouncil.govt.nz</a>)</p>		
HH1	Heritage	<p>Please provide a historic heritage assessment that addresses the full plan change area and the actual or potential effects of all forms of development, in particular activities involving land disturbance such as building platforms, roads and tracks, utility connections, retaining structures, fencing and planting.</p>
		<p>The archaeological assessment provided has been prepared in support of previous applications for backbone infrastructure works. This assessment does not assess the full plan change area or proposal.</p> <p>The assessment should specifically refer to the criteria in the AUP's RPS, part B5 (historic heritage) and identify how any adverse effects on any significant historic heritage place/s identified within the proposed plan change area will be managed in accordance with the B5 objectives and policies.</p> <p>Recent reporting should also be drawn from in any updated assessment – i.e.:</p> <p>Shakles, R., Burnett, Z. and Farley, G. September 2022. Proposed Residential Subdivision, Wairaka Precinct, Carrington Road, Mt Alert, Auckland: Archaeological</p>

			<p>Assessment. Prepared for Ngāti Whātua Ōrākei – Whai Rawa by Clough and Associates Ltd.</p> <p>Usher, E. August 2022. Carrington Stormwater Outfall 06: Final Report (HNZPTA Authority 2021/777). CFG Heritage report to Heritage New Zealand Pouhere Taonga, BECA Ltd, The Ministry of Housing and Urban Development and Marutūāhu and Waiohua-Tāmaki Rōpū.</p> <p>Further, the 1879 field book supporting cadastral plan SO 1992 may also be of use to determine other heritage buildings, features and areas of archaeological potential associated to the Whau Lunatic Asylum (later Carrington Psychiatric Hospital) and Farm (LINZ Recollect – Field Book 0312 pages 0312-039 to 0312-046).</p>	
HH2	<i>Pre-1900 stone wall</i>	Please provide details of how it is proposed to identify / protect the pre-1900 stone wall (NZAA R11/2979) located along the southern boundary of the plan change area.	The protection of this feature should be provided for in the plan change.	
HH3	<i>Precinct Heritage Resources</i>	Please provide a copy of the memorandum of understanding between Heritage New Zealand and Wairaka Lang Company Ltd. (as agent for Unitec Institute of Technology) regarding the identification, protection and management of cultural and heritage resources within the Wairaka Precinct.	A copy of this document should be provided to council and where relevant evidence also provided outlining any effects arising from the the plan change.	
<b>Non CI23(1) request matter/other comments</b>				
Early engagement with Heritage New Zealand Pouhere Taonga is encouraged.				

**PLANNING, STATUTORY AND OTHER MATTERS** (Specialist – **PETER REABURN** Cato Bolam – [peter@catobolam.co.nz](mailto:peter@catobolam.co.nz), 0274479248)

P1	Enabled Residential Yield	Please clarify the calculation made for potential yield.	<p>Assumed yield enabled by the plan change is important as a basis to then analyse potential effects arising from future development. This includes effects on infrastructure, including transport, open space and community facilities, as well as other community needs such as access to retail and employment. While assumptions for calculating yield have been given (8.1 of the AEE) there is uncertainty about how those assumptions have then been used to arrive at assumed yield.</p> <p>Please include details of:</p> <ol style="list-style-type: none"> <li>1. Total site area over which the analysis has been undertaken</li> <li>2. What areas have been excluded (m<sup>2</sup> of spine roading, m<sup>2</sup> of open space, anything else)</li> <li>3. Define "land efficiency" – what, comprises the 25% excluded.</li> <li>4. Detail what housing typology mix has been used for the assumptions.</li> <li>5. Describe, using the areas enabled for housing and the heights proposed, where the assumed housing typology numbers could be applied across the precinct (i.e. breakdown of possible numbers around the precinct).</li> </ol> <p>We would like to see the assessment clearly showing the geographic areas over which the calculations have been applied, ideally corresponding to some sort of table that shows the different ratios and assumptions that have been applied to each stage of the calculation to produce the final dwelling yield. Sufficient information is required to be able to replicate the same calculations on the identified mapped areas and therefore be able to test the</p>	
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			<p>sensitivity of the final dwelling yields to the assumptions applied.</p> <p>An example table is below (containing dummy information) that demonstrates the type of information sought. It should contain a separate row for each area within the precinct which has a different height limit or built height and dwelling typology assumed so that the calculations can be replicated. For example, block A has been split into two areas developed at different densities. Therefore, there it is shown as two separate rows in the table to be able to demonstrate the different densities and yields within each sub-area. I note that this information may be provided slightly differently for horizontally-attached dwellings (e.g. 2-3 level walk-up terraced housing) where individual sections may be first established and then dwellings constructed. This is fine, as long as it contains all of the information to be able to replicate and test the assumptions applied.</p>	
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Map Area Reference	Typology	Gross Zoned Area (ha)	Developable Area (1) (ha)	Ratio to Parcelled Area (2)	Net Parcelled Area (ha)	Site Cover Ratio (3)	Site Cover (m2)	Height Limit (storeys)	Built Height (storeys)	Total Floorspace (m2)	Av. Dwelling Size (m2)	Est. Dwellings	Av. Land Per Dwelling (net) (m2)	
A	Terraced	100	75	80%	60	50%	300,000	3	2	600,000	120	5,000	120	
A	Vertically-Attached	20	18	75%	13.5	60%	81,000	6	6	486,000	80	6,075	22	
B	Terraced	25	15	80%	12	50%	60,000	3	3	180,000	110	1,636	73	
B	Vertically-Attached	30	15	75%	11.25	60%	67,500	8	6	405,000	80	5,062	22	
B	Vertically-Attached	35	25	75%	18.75	60%	112,500	8	8	900,000	75	12,000	16	
<p>(1) This is the area which has undevelopable areas removed such as larger areas of open space (i.e. those areas that would often have an Open Space zoning in other situations), wetlands, etc.</p> <p>(2) This is a separate ratio, applied subsequently to (1). It is the ratio applied to estimate the share of the developable area that would result in actual privately-owned parcelled area once public roads, reserves, etc have been removed. It is the usual 68%-70% ratio applied to greenfield areas, but realise this will be lower in this case due to the existence of main roads, etc.</p> <p>(3) This is the % of the final parcelled area that is covered by floorspace.</p>														
P2	Consultation	Please provide information on the outcomes of local community consultation.					It is understood the Applicant is undertaking local community consultation. It will be helpful to have information on the outcomes of that consultation.							
P3	Regional Policy Statement	Please provide an analysis of the proposed plan change in relation to AUP RPS chapters B3 – Infrastructure, Transport and Energy; B4 - Natural heritage; B5 – Built heritage and character; B6 Mana Whenua; B7 Natural Resources; B8 Coastal Environment and B10 Environmental Risk.					Required for a full understanding of the proposed plan change under the RPS.							
P4	Mana Whenua	Please provide an analysis of the proposed plan change in relation to any applicable iwi management plan.					Required for a full understanding of the proposed plan change in relation to any relevant iwi management plan.							

P5	<i>Funding</i>	Please provide an analysis of the proposed plan change in relation to the Auckland Council Ten Year Budget / Long Term Plan 2018-2028	Required for a full understanding of the proposed plan change in relation to the demands of development enabled by the plan change and what is / what is not provided for in Council's LTP.	
P6	<i>Local Board</i>	Please provide an analysis of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020	Required for a full understanding of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020	
P7	<i>Land Contamination</i>	Please provide an analysis of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011	Required for a full understanding of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011	
P8	<i>Plan Change Provisions - Height</i>	Please explain why the applicant has elected not to use the height variation control in the B-MU zone in conjunction with the precinct provisions.	Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.	
<b>Non CI23(1) request matter/other comments</b>				
P8	<p>In relation to residential yield it would be helpful to have a comparison with a calculation of what yield is considered reasonably enabled by the current precinct provisions. This will better enable a comparison between current and future assumed needs for, for instance, retail and open space. In that respect it is of concern that the plan change appears to propose maintenance of current levels of retail and open space which may not address the extra demands arising from a significantly higher population. This is not included as an RFI, as it relates to the current rather than proposed provisions. However the applicant is encouraged to provide this information.</p>			
P9	<p>Spatial Distribution of future land use activities. It will be noted that a number of the Council's specialists (including under UD9 and EA1) have raised concern that the plan change, while identifying the location of some activities (e.g. open space on the precinct plan and retail in the provisions) and limitations on where industrial activities may be located) does not provide clarity on whether the location of non-residential activities in particular may be located in respect of the needs of the future community, and effects on the residential community. It is also difficult to appreciate how various land use activities may be connected to each other and to places beyond the precinct. Further, the retail activity locations are similar to those in the current precinct and may not be best located for the nodes of new development enabled by the proposed provisions. The Applicant is invited to reconsider whether what is proposed provides sufficient clarity in relation to these concerns. In that respect, while a master plan may not be a requirement of the plan change itself, it can nevertheless illustrate the vision sought for the site. There has clearly been much consideration of this already, and perhaps further planning that is underway. The</p>			

Applicant is invited to share as much of that planning as possible, as it may alleviate some of the concerns that are and could still be expressed about how the Precinct could develop, particularly in a way that does not address context and the needs of the community as a whole.

P10 The approach that has been taken in the plan change is to amend the current precinct provisions, rather than take a fresh look at how it is intended this future community will look (the vision) and what better way there may be to plan, through the AUP, for that future community. As an example, Objective 1 still refers to provision of a tertiary institution. While that will still be a major presence in the future community, what is intended to be enabled is more a higher density residential community – of 10,000 or more residents. Whether that ultimate urban outcome is adequately portrayed in the objectives and policy framework proposed is questionable. The Applicant is invited to reconsider whether the proposed provisions provide sufficient clarity in relation to these concerns.

27 July 2023

Peter Reaburn  
Planning Consultant  
Auckland Council

Dear Peter

## **Te Auaunga Precinct Private Plan Change Request: Clause 23 replies**

Thank you for your help with the Ministry of Housing & Urban Development (HUD) private plan change request for the Te Auaunga Precinct.

I attach the comprehensive response to the clause 23 questions from the Council on the private plan change request. This in is in the link provided.

The link comprises:

- (a) A copy of the clause 23 responses.
- (b) A copy of the updated plan change.
- (c) Copies of additional reports by professional consultants on key topics identified in the clause 23 questions.

### **A. Clause 23 replies**

The clause 23 replies take the form of a separate response for each of the questions. There are a couple of instances where the replies needed to be dealt with as an integrated response across two questions. These are made clear.

In the header portion of each response, is a clear statement is given as to which section (e.g. planning, urban design, parks) and the question number is being addressed. The numbers are referenced from your clause 23 letter.

The heading also identifies who has prepared the response. In a number of questions, the response needed to come from two or more consultants. In that case both / all names are given. The first name is the principal person who has co-ordinated the response. If the respective Council team members have got specific comments or clarifications they want on a particular topic, then they should feel free to either channel them back through yourself and myself or equally to go direct to the person identified as preparing the response.

## B. Plan change

The link also provides a copy of the updated plan change.

This comprises:

- (a) A clean copy of the plan change updated to take account of the clause 23 responses. This is the version that HUD seeks Council approval to commence the public notification and plan change process.
- (b) There is a duplicate version with the modifications that have been made between the plan change as lodged as part of the original application, and as plan change now proposed. This modifications on this version are highlighted in colour. There is a comment number alongside each of these changes.
- (c) A schedule referencing the comment number in the marked-up version, with an explanation of the reason for the change.

Hopefully this gives you a clear indication of the new plan change together with what modifications have been made and the reason for that modification.

## C. Additional reports

There are three additional reports included as part of this package:

- (a) Archifact (Adam Wilde) has prepared an independent “second opinion” on the former Oakley Hospital building. The report and the analysis of Mr Wilde is referenced within the responses to the heritage questions in the clause 23 request on the former Oakley Hospital building.
- (b) The landscape and visual assessment analysis by Boffa Miskell has been updated to take account of the extra views requested in the clause 23 response. That report is amended to include this extra material and other responses to clause 23. The landscape and visual assessment is now in substitution to the Boffa Miskell report lodged with the original plan change request.
- (c) An updated shadow study by Boffa Miskell. This is referenced in the. Clause 23 questions.

Obviously, the link being transferred to the Council is quite substantial. So I make sure that either at my end or your end, there is no IT constraint to this package successfully reaching you, could you please confirm you have received it. That would be greatly appreciated.

Obviously I am happy to answer any questions, or to meet with you and go through the material at your convenience.

Thank you once again for your assistance with this matter.

Yours faithfully



John Duthie  
Tattico

17 August 2023

John Duthie  
Director  
Tattico Limited  
PO Box 91562 Victoria Street  
Auckland 1142

via email: [john.duthie@tattico.co.nz](mailto:john.duthie@tattico.co.nz)

Dear John,

**RE: Clause 23(2) Resource Management Act 1991 Further Information – Private Plan Change request by the Ministry of Housing and Urban Development to rezone land within the current Wairaka Precinct, to amend the provisions within the existing precinct and to rename the precinct “Te Auaunga” – 1 – 139 Carrington Road**

Thank you for your comprehensive response to Clause 23 requests, received 27 July 2023.

The Council specialists team has reviewed the responses. There are limited matters on which further clarification is required. Please see the further information requests attached to this letter.

If you have any queries please do not hesitate to contact me.

Yours sincerely



Peter Reaburn  
**Consultant Planner for Auckland Council**

## Wairaka Precinct Plan Change

### Further Information Requests from Auckland Council (pursuant to Clause 23(2) 1<sup>st</sup> Schedule RMA)

#### Open Space

As preliminary comments to these further information requests please note the following.

1. In the Clause 23 OS1 and OS2 responses, the Applicant refers to the increase in scale of development enabled by the plan change as being “moderate” - in the order of 500 – 1,000 dwellings. Analysis based confined to a number of dwellings is not considered appropriate as dwellings enabled by the plan change can be provided in different typologies and with different sizes, with implications for the size and type of the household residing at each dwelling. Rather than an “existing – plus” approach, analysis of open space needs for the new community should be based on the total community able to be established after the plan change is in place. These further information requests are based on that premise.
2. Please refer to the attached plans – Existing Precinct and Proposed Precinct - which inform the further information requests identified below. These plans have been compiled by Auckland Council’s GIS Unit. The Existing Precinct Plan identifies three open space areas. The southern area is a “key open space private” area totalling 61,992m<sup>2</sup>. The middle “Mason Clinic” area is also a “key open space private” area and is 9,310m<sup>2</sup>. The northern area is an indicative neighbourhood park and is 3,611m<sup>2</sup>. The total committed open space area is approximately **7.4913ha**. The Proposed Precinct proposes a southern park comprising a 10,264m<sup>2</sup> area within the Unitec campus and another 14,187m<sup>2</sup> area in the same location; a 14,356m<sup>2</sup> “knoll park” area; a 2,181m<sup>2</sup> “Te Auaunga Access Park” area; a 9,813m<sup>2</sup> central open space area; and a 8,008m<sup>2</sup> northern park. The total committed open space area is approximately **5.8809ha**.
3. The Clause 23 responses make several references to what is or may be vested as “public” open space, including by reference to the proposal that there will be eight times the amount of public open space relative to the existing precinct. That appears to assume that all open space shown will be accepted for vesting. These decisions are yet to be made and will depend on a wide range of factors, including assessments arising from the further information that has been sought on the plan change. It is the total amount of committed open space shown on both the existing and proposed precinct plans, whether that ultimately becomes publicly or privately managed, that gives rise to the further information requests contained in both the original clause 23 requests for information, and these further requests.

#### Further Information Requests

*OS(F)1 Please clarify and illustrate on a plan or plans all of the open space figures used in the Clause 23 responses.*

The open space areas depicted on the attached plans are not the same figures as used in the Clause 23 responses. It is noted that, in respect of the existing precinct, figures have been calculated from Council’s own (AUP) records. In respect of the proposed precinct they have been calculated off



plans provided electronically by the Applicant (via Boffa Miskell). It is important that the differences that currently exists are removed so that the process from this point can rely on correct information.

*OS(F)2 Please clarify the basis for reducing the amount of open space to be provided in the precinct.*

Rather than providing more open space, as may be expected for the increased population that will be enabled by the proposed plan change, less open space is being committed for that greater population. In addition, of the areas proposed, the northern park, while not shown on the existing precinct plan, is already required as open space as being the curtilage to a heritage building – that makes the difference even greater.

*OS(F) 3 Please provide information on the methodology that has been used to calculate open space needs of the total community to be enabled after the plan change is in place.*

RFI OS1 requested this information. The reduced amount of committed open space to be provided emphasises this need for a clear methodology or at least a better understanding of the analysis behind the proposed provision of open space. While it is accepted this is not as simple quantity of open space issue the amount and type of open space is relevant. The “1ha per 1,000 dwellings” ratio mentioned in Point 37 of the OS1 / OS2 response should be explained, as to its adequacy, by reference to an acknowledged methodology. While the Clause 23 request OS1 specifically indicated reliance should not be placed on current Council guidelines, the responses nevertheless proceeded to do that.

The Clause 23 responses also focus on describing the open space areas proposed rather than conducting a needs analysis based on the community to be established within the precinct. That needs analysis should be based on the best possible assumptions that can be made regarding the needs of future residents, ideally with commentary on how those needs can be met by open space provided, and the functions those open spaces will perform, in different parts of what is a large site.

*OS(F)4 Please provide further information justifying that the Mason Clinic Open Space Area is in fact being replaced.*

The Applicant’s response to OS6 – replacement of the committed open space in the Mason Clinic area relates to parts of revised open space areas that total significantly less than currently committed. The information provided may have made more sense if the new precinct had at least the same total open space area committed as the current precinct, however that is not the case. Council’s current view is that insufficient information has been provided to confirm that the Mason Clinic open space has been replaced.

*OS(F)5 Please clarify, and illustrate on a plan, the logical / possible functions of the open space areas to be provided, and clearly separate out areas proposed as drainage reserves (i.e. with a stormwater function).*

Limited information has been provided on the functions of each proposed open space area. As an example, Response OS4 13, relating to the central park, refers to the OS3 response, which does not provide detail of the function of that important park. If, as appears to be the case, any particular reliance is being placed on the potential quality of that central park further detail should be provided on how that park could function to serve the needs of the future community. In general, this matter is not made easier by the absence of an updated master plan. In the absence of a master plan the logical / function of each open space area should be illustrated on a plan or plans.

The illustrated plan should clearly delineate areas required for stormwater management purposes and which may ultimately become drainage reserves.

*OS(F)6 Please illustrate on a plan the open space areas proposed to be provided as relocation of the currently committed “private” key open space from the Mason Clinic site.*

The OS6 response explains relocation of “private” key open space from Mason Clinic site, however this would be clearer if shown on a plan.

*OS(F)7 Please provide information on the proposed relationship between the proposed ‘Southern open space and Park’ and the adjacent privately owned open space within Unitec site.*

It is not clear from the information provided how these open spaces and the shared boundary between these open spaces will be managed.

*OS(F)8 Please provide a response to the following original OS2 request.*

*“The application documents refer to private open space, and communal open space, however do not specify standards or any other explanation or provisions as to how this should be provided. For instance, Appendix 3 to Boffa Miskell’s Landscape Assessment refers to Pocket Parks, however also to these being “Voluntarily provided”.*

As already noted information is sought on further standards or provisions to ensure provision of a variety of open spaces to ensure a connected network of open spaces will be provided within the precinct plan. The current information does not provide any potential possibility for a functional and connected open space network within the precinct area.

*OS(F)9 Please provide information confirming what provision is made within the precinct for sporting facilities to provide for the community enabled by the proposed provisions.*

While the Applicant has made clear indication of not supporting for provision of a sportsfield within the PC area, no clear reason has been provided that the precinct could not contribute to the sportsfield network (except that MHUD has other priorities). If sportsfield provision cannot be accommodated within the precinct, please demonstrate other sport and recreation facilities that could be incorporated into the development. It is noted in this respect that the former Unitec campus offered two sportsfields and a recreation centre with two indoor courts – all of which have already been closed and lost to the network without replacement provision.

## **Transportation**

*T(F)1 Subject to ongoing discussion and agreement with Auckland Transport (AT), please provide up to date traffic modelling assessment of the effects of the plan change on the adjoining road network, based on the latest information available in relation to road and intersection layouts associated with the Carrington Road Upgrade, and any other appropriate updates. Please also confirm the key assumptions adopted in agreement with AT in relation to trip generation, modal share, any discounts applied to through traffic on Carrington Road, etc.*

It is understood that the scope and details for the Carrington Road upgrade project, as assumed in traffic modelling undertaken to date, are still to be confirmed with AT. Areas of uncertainty include issues which appear to be significant in nature with regards to potential traffic effects, e.g. widening of bridging points over SH16 Motorway and railway over-bridge, use of priority lanes for bus priority versus ‘T2’, future intersection forms.

*T(F)2 Please undertake an assessment of parking effects on nearby residential streets resulting from development enabled by the plan change, in the event that parking controls indicated in the ITA, including Residential Parking Schemes, are not progressed by AT.*

It is understood that AT have yet to agree in principle to the parking controls proposed in the ITA, including residential parking schemes in the surrounding streets, aimed at mitigating against parking and traffic related impacts which are otherwise expected to occur as a result of the Plan Change.

### **Ecology**

*E(F)1 Please provide a response to E10 of the original Clause 23 request, in respect of the NZCPS.*

This request was for an assessment against the New Zealand Coastal Policy Statement because of the proximity to the coastal marine area and SEA Marine.

### **Planning**

*P(F)1 Please provide further clarification of the mix of household types that could logically be expected to establish in the precinct, as revised. Please also provide an estimate of the total population that may be expected as a result of this housing mix.*

Information has been provided on the possible number of apartments and terrace houses. However, without further information, such as bedroom numbers, it is difficult to assess what population may be expected to establish, including how that may compare to what is enabled in the current precinct provisions. For instance, a simple dwelling number analysis does not enable a good comparison where the composition of the current dwelling mix includes 1,000 student units – which it is assumed would be only one person units.



8 October 2023

Peter Reaburn  
Consultant to Plans and Places Department  
Auckland Council

cc. Michele Perwick, Senior Policy Planner

Dear Peter

## Private Plan Change Request – Te Auaunga Precinct, Carrington Road: Clause 23 Response – Additional request

Thank you for your assistance with the Ministry of Housing & Urban Development (HUD) private plan change request for the Te Auaunga Precinct.

The purpose of this letter is twofold:

- (a) to provide the responses to the follow-up clause 23 requests set out in your email dated 17 August 2023; and
- (b) to provide the final package HUD is requesting be notified. This is in response to your suggestion that, rather than notifying material which is distributed between the original application, the first clause 23 response and the second clause 23 response; it would be more helpful if the documentation was in a single consolidated version, with the plan change and supporting material. I agree with your view.

### 1. Clause 23 response

I attach the responses to the follow-up (second) clause 23 request.

In the first clause 23 response we set out a simple template based on each of the questions and provided the response through that template. In this response and being mindful of the suggestion of an integrated document set in support of the plan change request

I have set out the response under your 4 key headings;

- **Open space – Attachment 5** in the link. The *quality and connectedness* matters are addressed in section 4 of the Open Space report. The size / physical area of different open spaces is addressed throughout the report. The measurements for the new open space physical areas are taken from the subdivision plan in the current fast track application ‘**Carrington Megalot Subdivision**’. They are accurate but obviously subject to any changes required under the eventual Fast Track decision, and through survey.
- **Transport – Attachment 7.1** (Responses T(F)1 and T(F)2, and the model analysis in **Attachment 7.2**
- **Ecology – Attachment 8.1** under the topic “National Coastal Policy Statement”
- **Planning. – Attachment 1.1** under the topic hearing Typologies and Population

Attachment 1.1, 7.1, and 8.1 include the cl 23 first set of answers as well as the follow up questions. The “topic” headings make it clear which are the follow up questions.

The same numbering as in the first clause 23 request is used. However, in the site visit on open space you suggested the questions could be grouped with a focus on quality. This response follows that suggestion.

To assist with the open space questions, I also attach a summary, but the information is in attachment 5

## 2. Consolidated plan change request

I also attach the consolidated plan change request. This is found in the attached link. This link includes all the material, including the various clause 23 responses. Some of the files are large Please let me know if you have trouble opening any of them.

To assist you in understanding what is in the material, the following is noteworthy:

- (a) The plan change itself is the same plan change included with the first clause 23 response. The format shows the current Precinct Plan in black text, with new text in red and deleted text in red strike out. This is based on the Operative Wairaka Precinct, but independent of Plan Change 75 (although I have tried to notate provisions subject to Plan Change 75 by use of blue text)

The plan change also includes an update to Precinct Plan 1. This is primarily with respect to the boundaries of the open space shown within the plan change document (compared to the last version I sent you) . Most of this is imperceptible except for a minor variation on the southern open space boundary which we discussed at the site visit.

- (b) The application consists of a number of attachments. A number of additional attachments are added to that originally placed before the Council. There are two main new attachments. The first is the Adam Wild heritage assessment which came out of the response to the first clause 23 questions. The second is an open space assessment which I explain below. The other appendices are essentially the clause 23 material, consolidated with the original response.

Consequently, the appendices have been re-lettered to create a logical order. Urban design, landscape and open space have been grouped, and the two heritage reports have been grouped. This has led to consequential changes in the lettering of other appendices.

- (c) Across the two clause 23 requests, there are a number of issues raised in the areas of:

- urban design;
- landscape;
- transport;
- planning.

Each of the main reports have either been updated to include the responses to the two clause 23 requests within their content, or the responses included in an appendix to the main report.

- (d) The impact of the updated appendices or extension of the planning report is that now all of the clause 23 matters are within the primary attachments. As you suggested, this means there is one package of documents which cover all aspects of this application. This should assist members of the public, and eventually commissioners,. However obviously the original clause 23 responses will remain as a formal response.

If there are any issues of clarification that you need, please do not hesitate to contact me.

I look forward to receiving the result of the committee meeting on 2 November 2023.

Yours faithfully

A handwritten signature in blue ink that reads "J. Duthie". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

John Duthie

**Tattico**





**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Follow Up Question** OS(F)1-OS(F)9

**Specific request** Open space Refer the Council email

**Reasons for request** Refer the Council email

**Applicant response provided by** John Duthie of Tattico and Matt Riley and Rachel de Lambert of Boffa Miskell.

**Applicant response**

This response deals with the Clause 23 follow up open space requests as a whole. The formal response is in Attachment 5 forming part of the application package (link attached.) This is intended as a summary to assist in finding the responses

Attachment 5 is an open space report authored by Tattico and Boffa Miskell. This incorporates all the first clause 23 responses, updated to take account of precise areas for each of the open spaces and any clarifications sought under the follow up questions, together with any new material from the second clause 23 response.

In particular, Section 4 of the open space report describes the integration and connectivity across the open space network, its quality and function.

1. **OS(F)1** relates to the areas of open space.

The areas provided in the attached open space report are drawn from the current subdivision application under the fast-track consenting legislation. These areas have been produced by a surveyor, are accurate and replace the previous calculations. Obviously areas are subject to the Fast Track subdivision application decision and final survey.

The land area tables in the previous document have been updated to incorporate these latest figures.

*(Sections 2 and 6 of Attachment 5)*

2. **OS(F)2** The open space report outlines the changes in open space areas and location. While it is acknowledged there is a 0.8ha reduction in the gross area of what was previously private open space, there are two significant changes in terms of open space. The first is that there is a substantial increase in the amount of public open space proposed. The second is there is a significant increase in improvement in the quality of the open space proposed.

Both these issues are addressed in the open space report. As noted above, the key new information is in Section 4 of that report.

*(Sections 2 and 8 of Attachment 5)*

3. **OS(F)3** asks for the methodology, or at least the approach, in calculating the level of open space.

This is set out in the open space report. It addresses issues relating to providing:

- a network of open space which is interconnected,
- usable open space across the precinct that is within 400m of all residents, so that it is readily walkable, and
- a different range of open space activity and function across the proposed network.

Refer the Boffa Miskell plan attached to the Open Space report.

*(Section 4 of Attachment 5)*

4. **OS(F)4** relates to the Mason Clinic land.

The so-called Mason Clinic land, as identified on the Council's analysis, provides for 9,310m<sup>2</sup> of open space land.

This has been substituted for by the 9,773m<sup>2</sup> central park and the 3,246m<sup>2</sup> Te Auaunga walkway access, which is a total area of 1.3ha. This is set out in more detail within the open space report.

*(Section 9 of Attachment 5)*

5. **OS(F)5** asks for a plan showing the open space network.

This has been prepared by Boffa Miskell and is attached to the open space report. It provides two plans - shows a locational and a functional plan.

*(Sections 2 of Attachment 5 and attachment 5.1)*

6. **OS(F)6** relates to the Mason Clinic and asks for a diagram showing the relocation of this land.

HUD has always stated that it would provide an equivalent form of open space to the private open space on the Mason Clinic land.

In fact, the Mason Clinic land of 9,310m<sup>2</sup> of private open space is being replaced by 9,773m<sup>2</sup> a central park and the 3,246m<sup>2</sup> Te Auaunga access walkway.

*(Sections 9 of Attachment 5)*

7. **OS(F)7** deals with the southern park and the Unitec land.

The open space southern land is bordered by artificial wetlands and the Wairaka Stream. Unitec is retaining open space to the west of the proposed open space, adjoining the southern open space. This land is the foreground to the Unitec amenities and student

building. It creates passive open space areas for students. Undoubtedly these students could also use the southern park within the plan change.

It is intended that the southern open space vest in the Council as open space. It is anticipated that it will be appropriately signed and identified to make it clear it is a public amenity.

*(Sections 4 and 6 of Attachment 5)*

8. **OS(F)8** relates to private and communal open space.

This is addressed within the Open Space report.

In summary, the same requirements on private and communal open space as apply to new dwellings in the underlying zonings, equally apply within the precinct. There is no reduction in the private open space requirements.

The open space report addresses this.

*(Section 4 of Attachment 5)*

9. **OS(F)9** relates to sporting facilities.

The precinct does not provide for any formal public sportsfields or other public sporting facilities, as it is a private plan change.

The Boffa Miskell report and the open space report demonstrates there are significant spaces for informal recreation including opportunity for play spaces (e.g. kick-a -ball spaces).

All these aspects are covered in the Boffa/Tattico Open Space report.



26 October 2023

Peter Reaburn  
Consultant to Auckland Council

Dear Peter

## Plan Change 75

You have asked for my comment on Plan Change 75 and the proposed introduction of new policy 15A which sets a minimum open space requirement of 7.1ha within the precinct.

Boffa Miskell and Tattico have been providing advice to the Ministry of Housing & Urban Development (HUD) on the appropriateness of the open space provision for the precinct. It was covered in our plan change submission, and as it has been a focus in the clause 23 requests. We have set our proposal and the rationale out at length in our response and the open space report provided to the Council.

The Tattico/Boffa Miskell view and the HUD position is that, in terms of the Crown land held for housing:

- This 5.1ha provision of potential public open space in the locations proposed will meet the needs of residents and is all that is required within the precinct for this purpose.
- The open space has been conceptually configured to provide for a wide range of functions including spaces for playgrounds, informal active recreation (kick a ball around type activity), pleasure areas, formal gardens and connectivity both within, and beyond, the Precinct, providing for an accessible network of open space.
- The quality of these open spaces, in terms of location, connection and function, is a significant enhancement beyond what is currently proposed.
- Furthermore, instead of being identified as private open spaces (i.e. per the notation for most of the identified open space on the original Wairaka Precinct plan 1), which can formally be closed to the public, these areas are now intended to be identified as public open spaces. The proposal in the plan change, if accepted, will therefore increase the public open space from between 3,000-5,000m<sup>2</sup> to 5.1ha, if the Council agrees to accept this land as vested open space.

Obviously, there are other landowners within the precinct. Unitec itself has close to 1ha of open space for their own student use within the precinct, and Mason Clinic is expected to meet its needs internally to its site, for operational reasons.

If the inference from Council is that a greater area of open space should be provided within the Crown land than what is currently proposed, then my comments on that are:

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- (a) The Council has provided no evidence on this to date.
- (b) The Crown will advance this plan change based on the 5.1ha on the basis the proposal in the plan change is significant, fit for purpose, and will meet the needs of the new residential area.
- (c) If the Council has a contrary view, then that is something that is appropriately addressed and worked through the submission process. It is not a matter that will need to be determined prior to a clause 25 decision.

Obviously, Policy 15A is still working through the statutory process. It is not yet effective, and it may not ultimately become operative. The appeal period for PC75 has not yet closed.

Regardless, as the HUD plan change follows PC75 in time, the opportunity to determine the appropriate policy framework for the Precinct remains on foot. The HUD private plan change does not include Policy 15A and, even if Policy 15A were an operative policy, HUD would be entitled to pursue its deletion on the basis that it is not the most appropriate approach to the provision of open space within the precinct.

The open space policies as put forward in the HUD plan change request are those which the applicant wishes to advance in terms of the notified application version.

In the fullness of time, it will be determined whether or not Policy 15A stands through the statutory process. This includes whether or not there are any appeals to the inclusion of Policy 15A.

Happy to answer any questions.

Yours faithfully



John Duthie  
**Tattico**

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD1
<b>Specific request</b>	Please clarify what methodology has been used for urban design assessment
<b>Reasons for request</b>	<p>Chapter 2.0 – Methodology lists 3 elements that have informed the assessment but does not provide a clear methodology for assessment. What recognised good practice urban design principles have been used to make an assessment?</p> <p>The NZ Urban Design Protocol is quoted, but the UD Assessment then makes no further mention of any of the qualities listed in the Protocol and does not use recognised urban design principles to make the assessment.</p> <p>In the absence of a clear assessment methodology, the UD Assessment focusses on matters more related to planning such as shading, privacy etc, but fails to address bigger picture urban design principles such as how to create a neighbourhood with a clear character and its own identity; creating a place where public and private spaces are distinguished; a place with attractive and successful outdoor areas; creating a place that is easy to get to, and move through and that is easy to understand; a place that is adaptable over time; a place that is sustainable and enduring; and a place that has variety and choice etc.</p> <p>The assessment should demonstrate how the proposal (and the Precinct Plan) meets these urban design objectives.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 The reason for the request is to clarify the urban design principles that have been used to inform the assessment.</li> <li>2 The RFI states that the New Zealand Urban Design Protocol (<i>the Protocol</i>) is referred to in the methodology section of the urban design assessment (<i>UDA</i>) but that no further reference is made to either the Protocol or other recognised urban design principles within the assessment section of the report.</li> </ol>

## Responses to Auckland Council RMA cl 23 Requests | UD1 | 2

- 3 The assessment in the UDA is underpinned by the broader principles of the Protocol (in addition to an understanding of the characteristics of the precinct and the expected built form outcomes from relevant planning documents, as stated at section 2.0 of the UDA). While the broad themes represented in the Protocol's principles are weaved throughout the report, in order to respond to the specific request, I have prepared a detailed assessment of the Proposed Plan Change xx (Private) – Te Auaunga (*plan change*) against the Protocol which is attached as **Attachment 1**.
- 4 By way of context, while the plan change proposes changes to operative provisions, including additional height in some areas which would enable greater density, an intensified urban built form is already provided for by the operative Wairaka Precinct across the Residential, Special Purpose and Business zones. The framework for the bigger-picture urban design principles that the RFI refers to is therefore already largely established within those operative provisions.



**Attachment 1: Assessment of Te Auaunga Precinct against New Zealand Urban Design Protocol**

<b>Context</b>	
<p><i>Quality urban design recognises and builds on landscape context and character</i></p>	<p>The operative Wairaka Precinct provisions enable development over large parts of the precinct up to 27m, creating a higher density urban form in the area around a required road and open space network that will change the landscape character and context of undeveloped parts of the precinct from one of low-density, predominantly low-rise buildings separated by large areas of open space to a much more intensified urban built form.</p> <p>The plan change proposes some areas of increased height (while retaining the structuring road and open space network of the operative Wairaka Precinct, with some modifications), further defining the precinct as a distinctive higher density urban living community.</p> <p>The plan change proposes up to three taller buildings at the northern end of the precinct (Height Area 1), in addition to two areas of height up to 35m (Height Area 2) and an increase in height from 18m to 27m along the Carrington Road frontage (current provisions require a 20m set back at 18m stepping to 27m).</p> <p>The taller buildings within Height Area 1 will be visible within the wider landscape, for example, when travelling east along the SH16 North-Western Motorway and causeway. That level of visibility positively responds to the opportunity that this part of the precinct offers for 'landmark' buildings that act as a marker for the new community in a logical location close to the Point Chevalier town centre.</p> <p>The placement of the Height Area 2 locations is a response to the sloping nature of the precinct, placing potential 35m high buildings on lower lying land separated from Carrington Road.</p> <p>The increase in height along the Carrington Road frontage from 18m to 27m recognises the increased heights enabled along the eastern side of the road by both operative zonings (Special Purpose Healthcare Facility and Hospital zone which enables 27m) and Auckland Council's Plan Change 78.</p> <p>Changes are not proposed by the plan change to height in the southern part of the precinct in order to maintain a stepping down of built form to the adjoining residential neighbourhood.</p> <p>In summary, development that would be enabled by the plan change is consistent with the intensified urban built form already provided for by the operative Wairaka Precinct. Areas of additional height proposed by the plan change are a positive response to the landscape character and opportunities for comprehensive urban intensification that the precinct offers.</p>

**Responses to Auckland Council RMA cl 23 Requests | UD1 | 4**

<p><i>Quality urban design celebrates cultural identity and recognises the cultural values of a place</i></p>	<p>The plan change is proposed by HUD on behalf of the Marutūāhu, Ngāti Whātua, and Waiohua-Tāmaki Rōpū. As the future land owners, the Rōpū will have the ability to set the brief for development to respond as they see appropriate to their cultural identity and values, consistent with HUD’s Treaty of Waitangi obligations at the site.</p>
<p><i>Quality urban design ensures incremental development contributes to an agreed and coherent overall result</i></p>	<p>Wairaka: Precinct plan 1 sets out an agreed spatial framework for development of the site that was developed through the Proposed Auckland Unitary Plan process.</p> <p>The Precinct plan sets out an arrangement of development areas and structuring elements for the precinct, including a required open space and road network and retention of the scheduled Former Oakley Hospital Building and identified trees.</p> <p>This earlier framework was based on extensive masterplanning, led by Oculus and the Wairaka Land Company, to inform the structure of the original precinct.</p> <p>This framework was revisited in accordance with the Rōpū’s own vision for the precinct when it commissioned a new masterplan prepared by Grimshaw (Sydney) in collaboration with Boffa Miskell in 2019, as set out in further detail in response to the UD9 clause 23 request.</p> <p>The plan change retains the spatial framework set by Wairaka Precinct plan 1, with some modifications – largely focused on refinement of the location of open space.</p> <p>The plan change also retains operative provisions which require proposed development to be consistent with Precinct plan 1, providing a means to ensure that incremental development contributes to the spatial outcomes of the Precinct plan.</p>
<p><b>Character</b></p>	
<p><i>Quality urban design protects and manages our heritage, including buildings, places and landscapes</i></p>	<p>The plan change seeks to protect and manage heritage, including buildings, places and landscapes as stated in objective I334.2(6):</p> <p style="padding-left: 40px;">Identified heritage values are retained through the adaptation of the scheduled building and retention of identified trees, together with the management of the historic heritage, and Māori sites of significance on <u>Te Auaunga</u> land, and the contribution they make to the precinct’s character and landscape, are recognised, protected and enhanced in the precinct.</p> <p>Specifically with respect to the Former Oakley Hospital Building, the relationship between this heritage building and the development enabled by the plan change is set out in the Assessment of Landscape and Visual Effects and the Heritage Assessment by Adam Wild.</p>

**Responses to Auckland Council RMA cl 23 Requests | UD1 | 5**

<p><i>Quality urban design protects and enhances distinctive landforms, water bodies and indigenous plants and animals</i></p>	<p>The Wairaka Stream arises from the puna and passes through the precinct, joining to Te Auaunga (Oakley) Stream along the precinct's western boundary. The open space network shown on the plan change's Precinct plan 1 follows the path of the Wairaka Stream, using it as a foundation for recreational, walking, cycling and ecological connections. Previously piped sections of the Wairaka Stream within the Rōpū's landholding have been daylighted and enhanced as part of celebrating wai, the awa, pedestrian connectivity to Te Auaunga and open space / ecological corridors.</p> <p>The plan change retains operative provision I334.6.7, which protects identified trees, including a number of native species, and the open space network provided for both contains some of these trees, and will allow for additional, extensive native plantings.</p>
<p><i>Quality urban design creates locally appropriate and inspiring architecture, spaces and places</i></p>	<p>The vision and masterplan for the precinct (articulated in response to clause 23 UD9) include social elements that seek to provide appropriate building form reflecting the precinct's character and landscape.</p> <p>New development within the precinct (with the exclusion of up to three dwellings in the Mixed Housing Urban and Terrace Housing and Apartment Buildings zones in Sub-precinct C, permitted through the Medium Density Residential Standards (<i>MDRS</i>) will generally require resource consent, with assessment against design based criteria proposed as part of the plan change that reflect the vision and masterplan for the precinct, including building form and character and landscape.</p> <p>Through the design review phase of the consenting process this will enable the architectural and design response of the proposal to be assessed. Larger scale development proposals within the precinct are likely to also be reviewed by the Auckland Council Urban Design Panel, as was the case with the recently consented Maungārongo resource consents 1 and 2, increasing the degree of design interrogation as to the appropriateness of response to context.</p>
<p><i>Quality urban design reflects and celebrates our unique New Zealand culture and identity and celebrates our multi-cultural society</i></p>	<p>Development on the precinct is based on the spatial foundation set by the Former Oakley Hospital Building, open space along the Wairaka Stream, and retention and protection of identified trees. These elements provide a basis for urban form that responds to its site and its key sense of place elements.</p> <p>As discussed above, development throughout the precinct will generally be subject to design review through the resource consenting process. This will enable the extent to which development appropriately responds to its context to be assessed. Taller buildings within Height Area 1 are subject to a greater degree of design interrogation, including the extent to which they relate to the Tāmaki Makaurau cityscape and contribute to making a visual landmark, setting a greater expectation for the quality and uniqueness of response.</p>

Choice	
<p><i>Quality urban design ensures urban environments provide opportunities for all, including the disadvantaged</i></p>	<p>The plan change provides a range of opportunities for all members of the future community. These include:</p> <ul style="list-style-type: none"> <li>• <i>Residential living:</i> The plan change continues the Wairaka Precinct’s use of the Mixed Housing Urban, Terrace Housing and Apartment Buildings and Business Mixed Use zones, which enable and provide for a wide range of housing, including stand-alone, terraced and apartment typologies.</li> <li>• <i>Access to open space:</i> Proposed Precinct plan 1 provides access to an open space network throughout the precinct, in addition to connections to the adjoining Te Auaunga open space network that provides for extensive open space and passive transport mode connections.</li> <li>• <i>Tertiary education:</i> The plan change provides for the continued operation of the Unitec tertiary campus, providing access to a high quality education institute offering a range of vocational and on-going learning opportunities.</li> <li>• <i>Mana whenua cultural promotion:</i> The plan change provides for papakāinga and whare manaaki, and includes objectives and policies that seek to ensure an environment is created that contributes to Māori cultural promotion, consistent with the aspirations of iwi to provide these opportunities within the Tāmaki Makaurau urban area.</li> <li>• <i>Retail services:</i> The plan change provides for the establishment of retail within the site to serve the local demand of the precinct (in the nature of a 15 minute walkable city), and provides for convenient access (a 5-10 minute walk) to the services of Point Chevalier town centre to the north and Mount Albert town centre to the south. These facilities will also offer residents within the wider community access to walkable retail amenities.</li> <li>• <i>Access to public transport:</i> The precinct is located within a 5-15 minute walk of Baldwin Avenue and Mount Albert train stations and there are also frequent service bus routes along Carrington Road and Great North Road to the west.</li> </ul>
<p><i>Quality urban design allows people to choose different sustainable lifestyle options, locations, modes of transport, types of buildings and forms of tenure</i></p>	<p>Refer the response to the above. In addition, the precinct is well connected to multi modal access including good cycle connectivity and access to public transport.</p>
<p><i>Quality urban design supports designs which are flexible and adaptable and which will remain useful over the long term</i></p>	<p>As with the operative Wairaka Precinct, Te Auaunga Precinct sets a design framework for development at the overall level of the precinct, providing flexibility to adapt to changing demographic and community needs over time. Proposed development is expected to provide the spatial elements shown in Precinct plan 1 (including road and open networks and pedestrian and cyclist connections) but otherwise the precinct does not specifically prescribe the particular mix of uses, including housing typologies and, in that way, is therefore adaptable to changes in demand over the term of development of the precinct.</p>

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	<p>Specifically in regards to design at the scale of the individual building, the Business Mixed Use zone, which applies to approximately half of the Wairaka Precinct and is proposed to expand in area by the plan change, has provisions that apply to new buildings which encourage flexible and adaptable design. These are:</p> <ul style="list-style-type: none"> <li>• Policy H13.3(6): Encourage buildings at the ground floor to be adaptable to a range of uses to allow activities to change over time; and</li> <li>• Matter of discretion H13.8.1(3)(b): The provision of floor to floor heights that will provide the flexibility of the space to be adaptable to a wide variety of use over time.</li> </ul>
<p><i>Quality urban design ensures public spaces are accessible by everyone, including people with disabilities</i></p>	<p>The open space required by proposed Precinct plan 1 is located both centrally within the precinct and at its northern end, adjoining the Former Oakley Hospital Building. These locations place the primary open spaces within a 400m radius of most parts of the precinct, providing open space within a short walk of future development within the site. Refer <b>Appendix 1</b> for a map of the precinct and surrounding area which shows the distribution of open spaces.</p> <p>The potential challenges to level access between buildings and open space in the context of slope across the precinct is addressed by proposed matter of discretion I334.8.1(1A)(a) which retains discretion over whether proposed finished contour levels across the subject area where consent is being sought manage variations between the ground level of future buildings and adjoining existing and proposed public open space.</p>
<p><b>Connections</b></p>	
<p><i>Quality urban design creates safe, attractive and secure pathways and links between centres, landmarks and neighbourhoods</i></p>	<p>Accessibility and the provision of appropriate connections was a key component of the social element of the Rōpū's vision for the precinct (as articulated in the clause 23 UD9 response), and has been carried through into the various provisions proposed through the plan change as referenced below:</p> <ul style="list-style-type: none"> <li>• I334.8.1(1A)(c) retains to Council the discretion to consider whether new buildings are designed in accordance with Crime Prevention Through Environmental Design principles, including by providing passive surveillance of publicly accessible areas.</li> <li>• I334.8.1(1A)(h) retains to council the discretion to consider whether landscaping is provided to contribute to the achievement of quality amenity that is integrated with the built environment.</li> <li>• I334.8.1(1A)(b) has many provisions which retain to Council discretion to consider the appearance of buildings – relating back to policy I334.3(14) which requires new buildings to be designed in a manner that, where appropriate, enhances the streetscape and gateway locations of the precinct.</li> </ul> <p>These provisions are in addition to the objective, policies, matters of discretion and assessment criteria in the underlying zones that also focus on enhancing the attractiveness and safety of streets.</p>

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	<p>Overall, it is considered that these provisions enable the safety, attractiveness and security of pathways and links across the precinct to be appropriately managed.</p>
<p><i>Quality urban design places a high priority on walking, cycling and public transport</i></p>	<p>The plan change requires transport planning to be integrated with subdivision and development (policy I334.3(20)), specifically referencing integration with rail, bus, pedestrian and cycle connections, enabling Council to ensure that high quality connections are achieved as they develop alongside adjoining built development proposals.</p>
<p><i>Quality urban design anticipates travel demands and provides for a sustainable choice of integrated transport modes</i></p>	<p>I334.8.1(1A)(f) retains to Council discretion to consider whether proposed developments are consistent with any existing or new integrated transport assessment or other traffic assessment, allowing consideration of the extent to which sustainable travel modes are provided for.</p>
<p><i>Quality urban design improves accessibility to public services and facilities</i></p>	<p>Policy I334.3(20) requires subdivision and development to be integrated with transport planning in a way that:</p> <p align="center">Supports the provisions of passenger transport services, linking to key public transport nodes such as the Mt Albert train station and Point Chevalier public transport services</p>
<p><i>Quality urban design treats streets and other thoroughfares as positive spaces with multiple functions</i></p>	<p>As referenced earlier in this response, the plan change places a high priority on pedestrian and cyclist / micro mobility safety and amenity. This, combined with provisions that seek to provide for activation of, and passive surveillance over, publicly accessible spaces will result in streets internal to the precinct that provide high quality pedestrian and cyclist / multi modal environments.</p>
<p><i>Quality urban design provides formal and informal opportunities for social and cultural interaction</i></p>	<p>In addition to the required open spaces shown on Precinct plan 1, new buildings are expected to provide landscaping which contributes to the achievement of quality amenity. These spaces will complement the more formal opportunities for social interaction provided for via the Precinct plan 1 open spaces with smaller spaces that provide for informal social and cultural interaction and</p> <p align="center">... may be provided in the form of courtyards, plazas and other areas that are accessed by residents, visitors or the public including lanes and pedestrian accessways (I334.8.1(1A)(h)).</p>
<p><i>Quality urban design facilitates access to services and efficient movement of goods and people</i></p>	<p>The precinct is located within a 5-10 minute walk of Point Chevalier town centre and Mount Albert town centre, offering a future residential population access to the services within those centres.</p> <p>The precinct is also within the walkable catchment of two train stations and rapid transit bus corridor.</p>

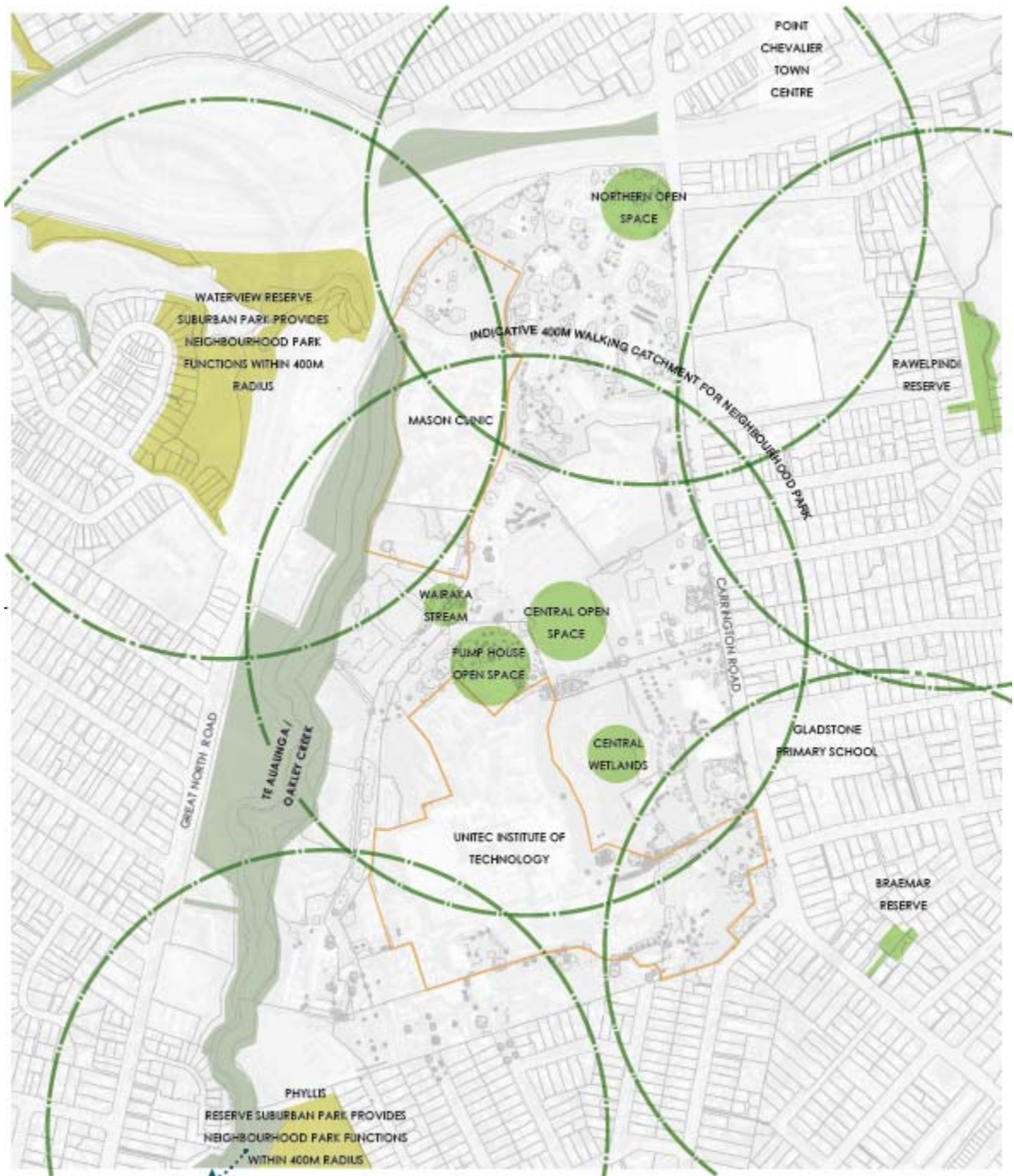
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	<p>Additionally, the plan change retains the operative Wairaka Precinct policy which references provision of retail activities in identified locations which serves local demand within the precinct (I334.3(29)). The location (and maximum gross floor area) of retail is specified at standard I334.6.2. This refers to capped levels of retail within the Mixed Use zone, the Special Purpose – Tertiary Education zone and in the Historic Heritage Place (Former Oakley Hospital Building). Provision of retail within the precinct is not required by the plan change but it is anticipated that retail to a level that serves local demand needs is likely to form part of development proposals. By way of example, a 1,500m<sup>2</sup> 'metro' supermarket at the base of a multi-level apartment building on Farm Road near the intersection with Carrington Road and a further 2,000m<sup>2</sup> of retail has been consented as part of the Maungārongo resource consents 1 and 2.</p>
<p><i>Quality urban design provides environments that encourage people to become more physically active</i></p>	<p>Development within Te Auaunga Precinct is based around a network of open space and pedestrian and cycle links that provide connections through the precinct and to Te Auaunga Stream open space corridor and regional cycling network. This spatial configuration places open space and pedestrian and cyclist movement routes as a key structuring element for future development. Neighbourhood parks and open space within the precinct are distributed to provide future residents with easy walkable (400m radius) access to local open space.</p> <p>Future buildings will be assessed as to the extent to which they provide for passive surveillance and attractive frontages to these spaces. The outcome is anticipated to be well-used open connections between open space that encourage physical activity.</p>
<p><b>Creativity</b></p>	
<p><i>Quality urban design builds a strong and distinctive local identity</i></p>	<p>The plan change will result in an intensified urban built form developed around an open space and pedestrian and cyclist network and retention of protected trees and heritage buildings, which will form a distinct urban living community within the wider area. The design assessment generally required of new buildings provides the opportunity for further development of place-responsive building designs. A distinctive sense of place for the precinct at a wider landscape level would also result from the development of the three taller buildings (as would be enabled by the plan change) at the northern end of the precinct in Height Area 1.</p>
<p><b>Custodianship</b></p>	
<p><i>Quality urban design creates buildings, spaces, places and transport networks that are safer, with less crime and fear of crime</i></p>	<p>As discussed earlier, new buildings will generally require consent in the precinct (unless they comply with the MDRS provisions in the underlying residential zones), with assessment against matters such as the extent to which the development is consistent with Crime Prevention Through Environmental Design Principles.</p>

<b>Collaboration</b>	
<p><i>Quality urban design supports a common vision that can be achieved over time</i></p>	<p>The plan change is based on a consistent vision for the precinct as an urban living community that is reflected in the operative Wairaka Precinct and was further developed in the February 2019 Reference Masterplan and Strategic Framework for the precinct, as set out in further detail in the clause 23 UD9 response.</p> <p>The 2019 document, which was the result of a strategic visioning process by the Marutūāhu, Ngāti Whātua, and Waiohua-Tāmaki Rōpū, refined the common vision for the precinct as:</p> <ul style="list-style-type: none"> <li>• A medium to higher density living environment where a range of connected open spaces provide residential amenity and create the structure for urban form.</li> <li>• A complete community, providing the opportunity for people to live, work and learn within the precinct, while benefiting from access to public transport and a well-connected walking and cycling network.</li> <li>• An inclusive community with a range of housing typologies.</li> </ul> <p>The proposed provisions in the plan change enable that vision to be achieved.</p>
<p><i>Quality urban design involves communities in meaningful decision-making processes</i></p>	<p>As discussed above, the Marutūāhu, Ngāti Whātua, and Waiohua-Tāmaki Rōpū have been through an extensive visioning process to arrive at a common vision for development of the precinct. This vision is consistent to that which underpins the operative Wairaka Precinct, while furthering realising the precinct's potential for development as an urban living community. Wider community engagement on this vision has occurred at a number of 'touchstones' over several years, including through the submission process on the Auckland Unitary Plan (Operative in Part), community meetings, and will be provided for again with the public notification of the plan change.</p>



**Appendix 1:** 400m radius from primary areas of the plan change required open space. Source: Carrington Open Space Framework, December 2022, Boffa Miskell.



**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD2
<b>Specific request</b>	Please provide details of the design rationale and design principles used to inform the location of the taller buildings.
<b>Reasons for request</b>	<p>In many places throughout the application documentation, the argument is made that taller buildings are suitable in the north-west part of the site due the presence of the motorway interchange.</p> <p>For instance, p.103 of the Planning Report states:</p> <p>It provides a range of housing typologies with high rise residential development in a part of the isthmus, because of the motorway interchange, that is well suited for more intensive forms of development.</p> <p>It would be helpful to understand why the presence of the motorway interchange is used to justify additional height.</p> <p>There is actually no access to the motorway in this location (the nearest access point is Western Springs over 2km away) and in any case, access to a motorway system is not typically regarded as a design principle for justifying intensive residential development and taller buildings. Tall buildings policies around the world use proximity to important public transit (not just transport infrastructure), important nodes or centres, access to employment and other amenities (retail etc).</p> <p>Whilst there may be a case for taller buildings, it is unclear why the presence of the interchange is used as a justification.</p>
<b>Applicant response provided by</b>	Rachel de Lambert & Matt Riley, Boffa Miskell, John Duthie, Tattico
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>The reasons for the request provided in respect of this question seek clarification on the relevance of the North-Western Motorway interchange to the provisions that enable the opportunity for up to three mid to high-rise buildings in the northwest corner of the precinct.</li> </ol>

- 2 The proposition of including a cluster of buildings of greater, mid to high-rise tower height within the precinct has been advanced both to take advantage of the considerable residential amenity offered by elevated views in all directions from the precinct (diversifying the housing choice and typology of the precinct) and in respect of establishing the new community's legibility within a wider urban context.
- 3 Height Area 1, located in the north-western corner of the precinct, is considered an appropriate location for buildings of the heights enabled by the provisions (being one building up to 43.5m, one building up to 54m and one building up to 72m) due to a number of factors. The relationship of this part of the precinct to the North-Western Motorway creates an open space context to the north and west which provides generous separation to adjacent established residential neighbourhoods to the north – Point Chevalier, and west – Waterview, thereby avoiding the potential for associated off site effects on residential amenity.
- 4 It is not any suggestion of access to the motorway that is considered to make this location, relative to its North-Western Motorway proximity, appropriate. Rather, the large scale nature of the motorway interchange infrastructure with its elevated overbridges creates a context in which taller tower elements have a level of comfortable fit. Other locations in Auckland where buildings of greater height are accommodated proximate to larger scaled motorway infrastructure include Smales Farm relative to the Northern Motorway, the mid-rise towers clustered on Hopetoun Street / Howe Street and Union Street relative to Spaghetti Junction and the emerging apartment development in the Central Park office park at Penrose relative to the Southern Motorway.
- 5 This part of the precinct has good walkable proximity to the Point Chevalier Town Centre and public transport on Great North Road and Carrington Road. The inclusion of a cluster of taller towers in this location reinforces the precinct's proximity to Point Chevalier and its legibility as a place as experienced by passers-by on the core transport routes adjacent.
- 6 This part of the precinct is also well away from the Regional Volcanic Viewshaft that traverses the precinct.
- 7 Additional commentary on those factors that render development at the additional height sought appropriate in landscape terms is provided in clause 23 response L7.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD3 & L10
<b>Specific request UD3</b>	<p>Please clarify how the maximum dimension has been derived and how building form will otherwise be controlled.</p> <p>NB: The response to this RFI can be combined with the response to L10.</p>
<b>Reasons for request UD3</b>	<p>The control of taller buildings is recognised as important, but it is unclear what building forms may be possible using the suggested method of maximum dimension. The concept of tall, slender towers is quoted, which are widely accepted as more appropriate forms than squat or slab-type buildings.</p> <p>Yet if a residential building of 18m depth is provided (quite reasonable for double-loaded apartments) the maximum dimension of 50m would allow a 46m long building up to a height of 54m. Even the tallest tower at 72m high could be 38m long. These forms would not be considered slender "towers" and could result in building forms not entirely suitable. Indeed, the Visual Simulations show buildings that are more slabs than towers.</p> <p>It would be helpful to understand how these dimensions have been derived and the range of building shapes that could be produced, together with a commentary on how the building shape will be controlled. The design quality of such buildings will be crucial, and it would be helpful to understand what additional design controls / assessment criteria could be used to ensure these taller buildings are of exemplary design quality.</p>
<b>Specific request L10</b>	<p>Please explain why no maximum tower dimension is stipulated for development up to 35m high, given that this still comprises development up to 13 storeys high within Height Area 2 and effectively controls development across most of the PC site.</p>
<b>Reasons for request L10</b>	<p>Height Areas 2 and 4 cover most of the PC site, so that the future streetscapes and built form landscape of the site will be largely determined by development within those areas. In effect, the more qualitative outcomes across the precinct will be reliant on the controls applicable to those two Height Areas. In addition, there could be significant height and building coverage variations across the Precinct, so that controls over the form of lower towers may still be required.</p>

Consequently, some justification for the absence of any Maximum Tower Dimension standard for development up to 35m high is considered necessary.

**Applicant response provided by** Rachel de Lambert & Matt Riley, Boffa Miskell and John Duthie, Tattico

**Applicant response**

**Height Area 1**

- 1 The maximum tower dimension is one of the tools used in the Auckland Unitary Plan (Operative in part) (*AUP*) to control the bulk and scale of buildings in identified areas. For example, in the Business – City Centre zone a maximum plan dimension of 50m applies to buildings above 28m in height in the 'special height area' (being the core central city area) and in the Business – Metropolitan Centre Zone a maximum plan dimension of 55m applies to buildings above 32.5m in height.
- 2 This same form of tower dimension control has been adopted in respect of the three potential towers in Height Area 1 with the lesser 50m dimension proposed for the two lower towers and a reduced 42m dimension for the enabled 72m tower.
- 3 In addition to this control, comprehensive matters of discretion are proposed to ensure quality building form and appearance are achieved for all new buildings within the precinct, for example:

I334.8.1(1A)(b) Building form and character:

- (i) whether building design and layout achieves:
  - (f) high quality visual interest through the use of façade modulation and articulation, and/or the use of materials and finishes and ensures any otherwise unavoidable blank walls are enlivened by methods which may include artwork, māhi toi, articulation, modulation and cladding choice to provide architectural relief;
  - (k) long building frontages are visually broken up by façade design and roofline, recesses, awnings, balconies and other projections, materials and colours.

**Height Areas 2 and 4**

- 4 The clause 23 request identifies that Height Areas 2 and 4 apply to most of the area subject to the plan change and seeks justification for the absence of any maximum tower dimension standard for development up to 35m high.
- 5 The maximum tower dimension standard has not been proposed for buildings up to 35m in height for the following reasons:

- (a) HUD's consultant team considers that the likely maximum number of levels achievable within 35m is 10 storeys, or two storeys more than are expected to be achieved in the 27 metre Business – Mixed Use height control applying to the precinct - where 8 storeys is considered achievable. In respect of clause 23 request L10, it is unclear how Council's reviewer considers a 13 storey building could be achievable within 35m (Height Area 2). That would require a 2.6m floor to floor which is not considered to be realistic.
- (b) The maximum tower dimension control applies in the Business – City Centre and Business – Metropolitan Centre zones in the AUP above 28 and 32.5m respectively, as set out above. The maximum tower dimension control is not considered to be a helpful additional control in respect of the two storeys above 27m in relation to the precinct and would likely result in poor building form outcomes (if applied).
- (c) Discretion is retained to Council when assessing new buildings, including those in Height Areas 2 and 4, over aspects of building form and appearance that may result from larger scale buildings such as those enabled in Height Area 2, as set out above. These provisions are considered to appropriately address any potential additional visual dominance effects which may result from the non-application of a maximum tower dimension standard in Height Areas 2 and 4 – which is understood to be the concern of this particular clause 23 request.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD4
<b>Specific request</b>	Please clarify how good quality design outcomes can be delivered with the heights proposed across the site.
<b>Reasons for request</b>	<p>The UD Assessment and Planning Report focus on the increased yield that additional height will bring, but with little discussion on the impact on the quality of the urban environment. There is discussion around the effects on property outside of the site, but little discussion around the impact that having many 35m buildings (which could be 11 storeys) would have on the quality of the urban environment, the spaces between the buildings and amenity of residents (privacy, outlook, access to sunlight). If the Precinct Plan is relying on the AUP for standards, then these 11 storey high buildings could be just 12m apart. Also the character of the precinct and the quality of the environment is partly informed by the massing of the buildings as much as the height. Many slender buildings, with plenty of space around them, and variation in height, will produce one type of environment. A few slab-type buildings with less space, and consistency in height could produce quite a different outcome.</p> <p>It would be helpful to understand how potentially adverse effects can be managed through the application of the proposed plan change provisions. Some precedents of neighbourhoods of predominantly 35m buildings would be helpful to understand the impact and how any adverse effects could be managed.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 Clause 23 query UD4 seeks further information on the quality of the urban environment that may be created within those areas of the precinct which enable 35m high buildings, including effects of these areas on the character of the precinct, the quality of spaces between buildings of up to 35m in height, and the amenity for residents within these buildings. <ul style="list-style-type: none"> <li><u>Number of 35m high buildings</u></li> </ul> </li> <li>2 The clause 23 query refers to the possibility of the plan change enabling many 35m high buildings. A combination of the total size of Height Area 1 and Height Area 2 and site slope</li> </ol>

## Responses to Auckland Council RMA cl 23 Requests | UD4 | 2

(as discussed below) means that 35m high buildings are unlikely to be significant in number and, furthermore, will form a relatively small proportion of the total built form of the precinct.

- 3 The plan change enables buildings up to 35m in height over approximately 10 percent of the precinct (6.5ha). This comprises the 0.9ha Height Area 1 (within which three taller buildings above 35m are also enabled, as discussed in other clause 23 responses) and the 5.6ha Height Area 2. This compares to approximately 24 percent of the area of the precinct in which 27m high buildings are enabled – being within Height Area 4 (15.37ha).
- 4 Height Area 1 (HA1) and Height Area 2 (HA2) are on sloping land, falling from east to west by approximately 10m. Around half of HA1 is rolling land (8 – 15 degrees). The HA2 land to the south of HA1, which includes the Taylors Laundry site, has flat to gently undulating platforms of ground separated by more steeply sloped banks. The HA2 land to the west of the Spine Road has areas of flatter land that begins to slope more steeply down in its south-west corner towards Te Auaunga. These topographical characteristics are likely to place some restrictions on the positioning of building platforms and again will reduce the number of multi-level buildings that would be more easily developable on flatter land.

### Character of the precinct

- 5 While not framed as a question, the clause 23 query states that:

...the character of the precinct and the quality of the environment is partly informed by the massing of the buildings as much as the height. Many slender buildings, with plenty of space around them, and variation in height, will produce one type of environment. A few slab-type buildings with less space, and consistency in height could produce quite a different outcome.

- 6 Seen as a silhouette, variations in the collective roof and skyline profile of buildings across the 35m HA1 and HA2 areas will be created by their stepping down with the slope of the land. The relatively small size of HA1 and HA2, relative to the size of the precinct, means that 35m high buildings in these areas will be seen within, and as part of, the varied height and built form context across the wider precinct created by its topography, in addition to its differing height areas. It is considered these factors will mean that, in built character terms, the 35m height of buildings enabled in HA1 and HA2 will not result in uniform or consistent apparent height.
- 7 This stepping of buildings with the land in HA1 and HA2 is also considered to assist in modulating the collective massing of buildings as seen within these areas. For this reason, the application of Business – Mixed Use (B-MU) zone Standard H13.6.4 Maximum tower dimension and tower separation is not considered necessary in the precinct (refer I334.6(2)(a)(i)).

### Quality of spaces between buildings

- 8 The clause 23 query states that if the plan change is relying on the Unitary Plan for standards, then '*these 11 storey high buildings could be just 12m apart*'. (Note that a 35m building height is anticipated to accommodate 10 storeys – to a potential maximum of 11 storeys. Refer to the discussion on storey height in Attachment 1 to the response to clause 23 query UD5.)
- 9 The author of the query is correct – the precinct relies on the underlying Unitary Plan zone provisions in terms of managing the separation distance between buildings. Application of



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B-MU zone standard H13.6.9 Outlook space, which applies in HA1 and HA2, would – as referred to in the query – separate neighbouring buildings by up to 12m depending on the orientation of outlook spaces. The plan change does not propose to separate buildings up to 35m in height by any greater distance than the requirements of the underlying B-MU zone. This may mean that some 35m buildings within HA1 and HA2 are relatively closer together, which may be a desirable outcome, such as when they are adjacent to each other along street frontages. In other instances, buildings are likely be further apart. For example, when on opposite sides of the road within the precinct's street network. This flexibility is consistent with the approach in the underlying B-MU zone and allows development latitude to respond to differing locational characteristics.

- 10 The reasonably small size of HA1 and HA2 and their slope (discussed above), combined with their relatively short east-west dimensions means that there is unlikely to be sizeable contiguous groupings of buildings up to 35m in height. Within this context, the potential for reduced sunlight and daylight access to streets and public open spaces is considered to be low. For these reasons, it is considered not necessary to apply Standards H13.6.3 Building setback at upper floors and H13.6.4 Maximum tower dimension and tower separation, which manage these outcomes in the underlying B-MU zone, within the precinct (refer I334.6(2)(a)(i)).

### Amenity of residents

- 11 The clause 23 query requests further information on how privacy, outlook and access to sunlight is managed for residents within buildings of up to 35m height in the precinct.
- 12 A primary tool used in the underlying B-MU zone to manage privacy and outlook is the Outlook space standard H13.6.9. This standard applies in the precinct. Privacy is also managed by matter of discretion I334.8.1(1A)(b)(iii). This provides to Council the discretion to assess whether:

outdoor living areas and internal living spaces achieve privacy from publicly accessible areas while maintaining a reasonable level of passive surveillance.

- 13 Additionally, assessment criterion I334.8.2(1A)(b)(i) refers back up to policies including policy I334.3(13) for new buildings that comply with Standard I334.6.4 Height. This policy, with its requirement for new buildings to be designed in a manner that '*provides for a high standard of amenity*' gives a pathway to Council to consider the residential amenity offered within HA1 and HA2 buildings, including privacy, outlook and access to sunlight.
- 14 In combination, these provisions are considered to be satisfactory to manage residential amenity, including privacy, outlook and sunlight, in buildings up to 35m height within the precinct's HA1 and HA2 areas.

### Precedent neighbourhoods

- 15 The clause 23 query requests precedents of neighbourhoods of predominantly 35m buildings as a point of comparison to the 6.5ha total area of HA1 and HA2. Neighbourhoods of mid-rise residential buildings are emerging across Auckland's urban areas. While these neighbourhoods do not yet comprise predominantly 35m (10 storey) buildings, several include buildings in the range of 9 to 11 storeys (or greater) in height, amongst other mid-rise buildings. These are generally recently constructed, consented or proposed developments. This suggests that the number of these buildings, within the greater number of mid-rise residential neighbourhoods enabled by Plan Change 78 (Auckland Council's

response to the National Policy Statement on Urban Development) will increase over time. Examples of such neighbourhoods are discussed below.

*Wynyard Quarter*

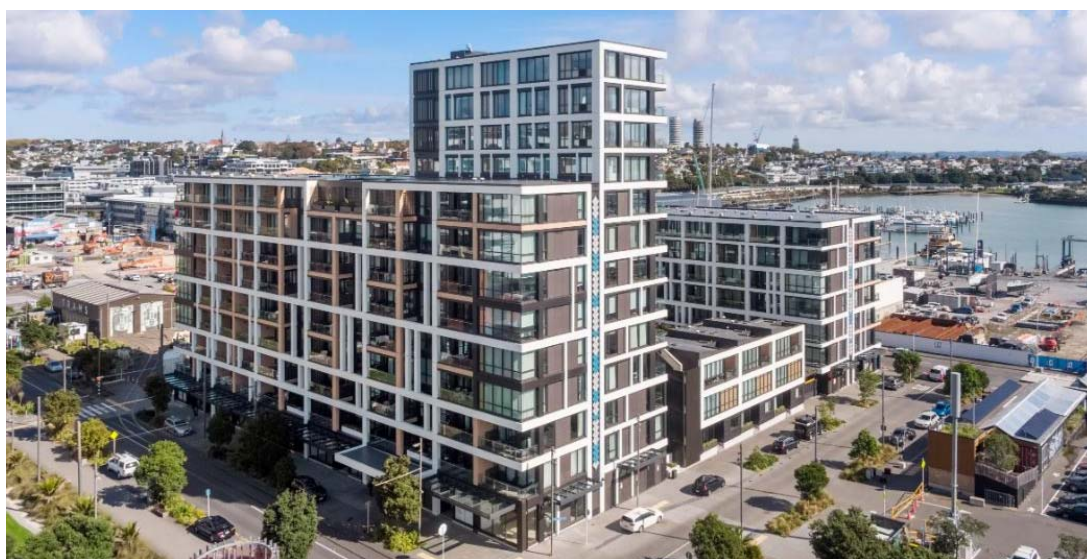
- 16 The Wynyard Quarter is an approximately 37ha highly mixed use neighbourhood on Auckland's waterfront that has been under development for the last two decades. 30 Madden Street is a recently constructed building which is 9 storeys in height along its Daldy Street frontage and 13 storeys in height along part of its Madden Street frontage (refer **Figure 1** below). The Northbrook development at 200 Pakenham Street West is a consented scheme (LUC60410747 March 2023), not yet constructed, of two 11 storey buildings (44.6m height) one at the corner of Pakenham Street West and the Daldy Street linear park and the other on the corner of Beaumont Street with the new east / west lane (refer **Figure 2** below).

*Te Tauoma residential development*

- 17 This is a masterplanned development of mixed use residential buildings on a site over 12ha in area formerly owned by the University of Auckland at 231 and 263 Morrin Road, Saint Johns. Stage 1A was approved in September 2020 (LUC60335181) and includes adjoining apartment buildings along Morrin Road of 9 – 10 storeys in height. Stage 1B of the masterplan, for a 14 level building and an 18 level building, was approved in February 2023 by an Expert Consenting Panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (refer **Figure 3** below).

*Alexandra Park Raceway*

- 18 Along Green Lane West in Epsom, a masterplanned neighbourhood of mid-rise residential buildings on 5.4ha of B-MU zoned land that was formerly part of Alexandra Park Raceway is now partially completed and occupied, with additional buildings planned. 223B Green Lane West is an existing, occupied 9 level building (refer **Figure 4** below). 223C Green Lane West is a planned complex of two 11 level buildings adjoining 223B Green Lane West (refer **Figure 5** below).



**Figure 1:** The 10-13 storey 30 Madden Street building in the Wynyard Quarter.



**Figure 2:** The 11 storey consented Northbrook development in the Wynyard Quarter.



**Figure 3:** The Te Tauoma residential development, showing the consented Stage 1A development of three 9-10 storey apartment buildings along Morrin Road and the consented Stage 1B development of a 14 storey and an 18 storey apartment building behind.



**Figure 4:** The 9 storey apartment building at 233B Green Lane West.



**Figure 5:** One of the two proposed 11 storey apartment buildings at 233C Green Lane West.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD5
<b>Specific request</b>	Please provide a more detailed assessment of what effects 27m buildings will have on the streetscape.
<b>Reasons for request</b>	<p>Much of the assessment focusses on the effects of the increased height on the properties on the east side of Carrington Road, but there is little discussion on the impact on the streetscape itself. Whilst it is acknowledged that the character of this street will change to urban, there is quite a difference between 5/6 storeys (18m) to 8/9 storeys (27m) in terms of the potential over-bearing / over-shadowing of the street and the impact on all the users of the street. Jan Gehl in particular talks about the connections and relationship of occupiers of upper floors to people within the street.</p> <p>The intended character of the street is unclear. 8/9 storey buildings with active (non-residential) uses on the ground floor will result in a different character than one where residential is used along the ground floor, and the intended character will help to inform the debate about the appropriate height.</p> <p>It would be helpful to add some commentary on these issues and understand some precedents for this scale of building in a non-central city location.</p> <p>Furthermore, the cross-sections provided suggest the land is flat either side of Carrington Road. In reality there are changes in levels (both rising up and falling away), which could have further impact on the relationship of buildings to the street and it would be helpful to understand these impacts.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<p>1 This request for information has four components. They are:</p> <ul style="list-style-type: none"> <li>(a) streetscape effects;</li> <li>(b) character;</li> <li>(c) precedent examples; and</li> </ul>

- (d) changes in level relative to Carrington Road.

**Streetscape effects**

- 2 The potential streetscape effects on Carrington Road of the increase in height referred to in the clause 23 request are related to visual dominance and shading. Reference is also made to the connection between occupiers of upper floors of buildings with increased height to people on the street. These matters are discussed below. Separate discussion on the storey height referred to in the clause 23 request is also included as **Attachment 1** to this response.

*Visual dominance*

- 3 Pages 23-28 of the urban design assessment (*UDA*) assess the potential visual dominance effects generated by removal of the Wairaka Precinct's 18m height area for a 20m depth along the Carrington Road frontage, and its replacement with a 27m height area. (Note that the developable depth of this frontage in the operative plan sits at around 12m – not 20m – as around 8m in width for road widening is required along the frontage.) The *UDA* considers potential visual dominance effects on both properties on the east side of Carrington Road and streetscape effects on the road itself. Conclusions of the assessment, at page 28 of the *UDA*, are:
- (a) The operative Wairaka Precinct provisions enable an urban built form along the precinct's future Carrington Road frontage.
  - (b) The plan change will enable buildings of increased scale (up to 27m) along the precinct's future Carrington Road frontage. However, these can be comfortably accommodated across the approximately 30m width of Carrington Road (building front to building front), which is what is provided for in the operative plan for the road widening. These buildings will be opposite potential 26m high buildings on the Point Chevalier Clinical centre site (Special Purpose – Healthcare Facility and Hospital zone) and 21m high buildings on the proposed Residential – Terrace Housing and Apartment Building (*THAB*) zoned sites south of Fifth Avenue within Proposed Plan Change 78's (*PC78*) walkable catchment.
  - (c) Potential visual dominance effects of the proposed 27m height on that part of Carrington Road with enabled 11m (12m with qualifying roof form) buildings on Residential – Mixed Housing Urban (*MHU*) zoned sites on the eastern side of the road between Fifth Avenue and Segar Avenue are discussed at page 24 of the *UDA*. This analysis applies to both the *MHU* zoned sites themselves and to that part of the Carrington Road streetscape. (It is noted that several submitters on *PC78*, including the applicant, have requested that these properties be rezoned *THAB*, given the isolated nature of this pocket of lower zoned land in the middle of an area targeted for urban intensification.) To reiterate its conclusion, the potential for visual dominance effects along this part of the streetscape are reduced by the width of the road (approximately 30m building front to building front) and are appropriately managed by the bespoke matters of discretion that manage the form and appearance of frontages of new buildings to Carrington Road (I334.8.1(1A)(i)).

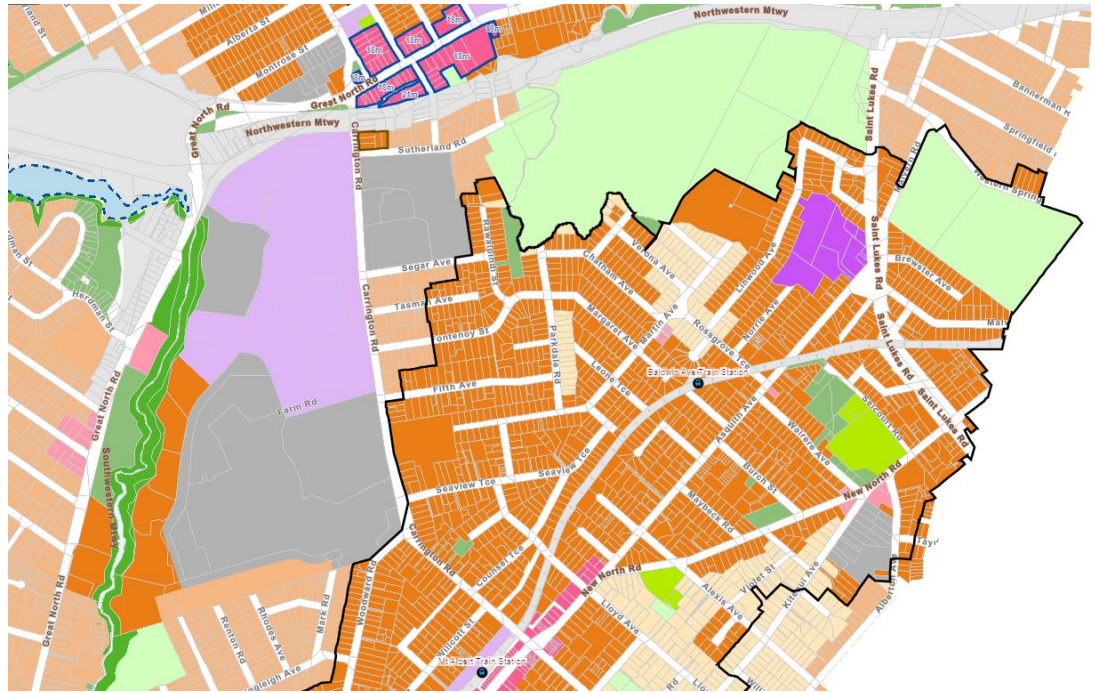


Figure 1: PC78 proposed zoning around the precinct. The orange area with dark line boundary is the THAB zone walkable catchment.

*Shading effects*

- 4 Pages 27 – 29 of the UDA assess shading effects of the height requested by the plan change on neighbouring properties, including residential properties on the eastern side of Carrington Road. The UDA concludes that any potential sunlight access effects on residentially zoned properties opposite the precinct are low.
- 5 The shadow diagrams attached to the UDA show a low level of additional shadow cast on Carrington Road itself from the plan change’s requested increase in height, with it largely limited to some additional shading on the footpath on the eastern side of the road from 3pm at certain times during the year. Overall, that part of Carrington Road (including its footpaths) which adjoin the precinct retain access to sunlight through much of the day and throughout the year, contributing to the maintenance of a good level of pedestrian amenity. Any effects on pedestrian amenity from the additional shadow are considered to be low.
- 6 Specific analysis follows:
  - (a) Up until at least 1pm throughout the year, the shadow diagrams show no shadow cast beyond the precinct’s Carrington Road boundary by either built form enabled under the operative Wairaka Precinct provisions or that which would be enabled by the plan change – leaving the road and footpaths on both sides in full sunlight.
  - (b) At 3pm on the Summer Solstice, the footpath on the eastern side of Carrington Road is clear of shadow from built form enabled under both the operative Wairaka Precinct and from built form enabled by the plan change provisions. Differences emerge at 5pm on the Summer Solstice, where the shadow cast by built form enabled by the operative Wairaka Precinct remains clear of the footpath on the eastern side of the road, whereas it is in shadow cast by the built form enabled by the plan change provisions.

- (c) At 3pm on both the Winter Solstice and Spring Equinox, shadow from built form enabled by both the operative Wairaka Precinct and plan change provisions covers the western side of Carrington Road, extending over the northern end of the footpath on the eastern side of the road for the operative Wairaka Precinct and covering a greater length of this footpath for built form enabled under the plan change provisions. At 5pm, the footpath on the eastern side of the road is in full shadow under both the operative precinct and proposed plan change provisions.
- (d) Carrington Road is largely free from any additional shadow cast by the three proposed taller buildings in Height Area 1. Additional shadow is limited to 5pm on the Spring Equinox, across a short segment at the northern end of Carrington Road in the vicinity of the Point Chevalier Clinical Centre.

*Relationship between upper floor residents and pedestrians*

- 7 The clause 23 request makes the comment that:

Jan Gehl in particular talks about the connections and relationship of occupiers of upper floors to people within the street.

- 8 It is presumed that the context for this comment is the idea that there is a more direct sensory (ie: visual and acoustic) relationship between residents of lower floors of a building and pedestrians on the street, where for example, voices can be heard and faces seen, and a greater perceived 'connection' to the street for residents of lower floors because of their physical proximity to it.
- 9 There is no clear nexus between this concept and potential effects on the streetscape amenity of Carrington Road. Applying the concept to the provisions proposed by the plan change, residents within the lower floors of a 7 – 8 storey building (refer to Attachment 1 for a discussion on storey height) that would be enabled along the Carrington Road frontage would have a more direct sensory connection with the street, whereas residents within upper floors are likely to retain some sensory connection with it, while also benefiting from the amenity of potential mid to longer distance views over the landscape.

**Character**

- 10 In responding to this element of the clause 23 request, it is first relevant to consider the planned character along Carrington Road, as enabled in the Auckland Unitary Plan (Operative in Part) (AUP) provisions and proposed by PC78. These provide for a moderately intensive urban character, resulting from both building scale and a mix of land uses, as discussed below:

- (a) Building scale: The operative Wairaka Precinct enables buildings of at least 5 storeys along the precinct's Carrington Road frontage within the 18m height area that applies along that boundary. Enabled building heights along much of the eastern side of the road, opposite the precinct (except for buildings up to three storeys on MHU zoned sites between Fifth Avenue and Seagar Street) are of a complementary but potentially greater urban scale: 7-8 storeys is enabled along the frontage of the Point Chevalier Clinical Centre site (via the 26m height provided for in its Special Purpose – Healthcare Facility and Hospital zoning) and a 6 storey (21m) height, is proposed via PC78 on THAB zoned walkable catchment sites south of Fifth Avenue.
- (b) Land use: The operative Wairaka Precinct provides for a wide range of activities, including (but not limited to) education, business, health, community and recreation



facilities and residential accommodation (refer Policy I334.3(1)). This includes retail uses being provided for along Carrington Road up to a gross floor area cap, in order to not adversely affect the role, function and amenity of Point Chevalier and Mt Albert town centres (Policy I334.3(30)). These uses support the diverse urban community described in the operative Precinct Description. The Wairaka Precinct's Carrington Road frontage south of Farm Road currently has an education land use emphasis, reflecting its Special Purpose – Tertiary Education zoning. Its frontage north of Farm Road has a stronger residential land use emphasis (dwellings are a permitted activity) while also enabling a range of other land uses, as described.

- (c) The eastern side of Carrington Road also has an existing (and planned) mix of uses, although these are more spatially defined with a greater residential emphasis. There are medically related land uses on the Point Chevalier Clinical Centre site towards the northern end of the road; a school (Gladstone Primary) opposite the southern end of the precinct's Carrington Road frontage; with the balance of those sites on Carrington Road opposite the precinct anticipating medium (MHU) to higher density (THAB) residential land use.
- 11 The plan change will result in some, but not a significant, change to the planned urban character of Carrington Road adjoining the precinct. There will be a moderate increase in the enabled height of the buildings directly along the precinct's Carrington Road frontage, but these will be complementary in scale to those enabled on sites along much of the eastern side of the road (as described above). Changes in scale to the MHU zoned Carrington Road properties are appropriately managed, as discussed in the UDA at page 24, by bespoke criteria relating to building form and appearance along Carrington Road (I334.8.1(1A)(i)). The limited changes proposed to provisions managing retail uses along Carrington Road within the precinct will not result in change to the planned diversity of land uses.
- 12 In summary, the operative AUP and proposed PC78 provisions result in a planned, moderately intensive, urban scale of buildings and mix of land uses along that part of Carrington Road adjoining the precinct. The plan change will result in some increase in that intensity due to the proposed increase of height along the precinct's Carrington Road frontage, but that is both responsive to the precinct's context close to two town centres and public transport and, as discussed earlier, is able to be accommodated across the approximately 30m width (building front to building front) of the road corridor.
- 13 Also relevant to the analysis of character above is the recent approval (March 2023) through the COVID-19 Recovery (Fast-track Consenting) Act 2020 (*Fast-track Act*) process of Maungāroho resource consent 1 (RC1) and resource consent 2 (RC2) for apartment buildings with supporting ground level retail and commercial uses along the Carrington Road frontage of the precinct. Refer to **Attachment 2** which provides a summary of the Maungāroho consents. For assessment purposes, these buildings now form part of the receiving environment, bringing about a significant change in that environment. RC1 occupies a 160m length of the Carrington Road frontage directly to the north of Gate 3. It comprises two 7 storey buildings (up to approximately 25m height) along Carrington Road with two 9 storey buildings (up to approximately 34m height) to the rear. RC2 occupies 120m a length of the Carrington Road frontage directly south of the consented position of Gate 1 and comprises four buildings along Carrington Road: two are 7 storeys (up to approximately 26m height), one is 9 storeys (approximately 30.5m height) and one is 10 storeys (approximately 36m height). All of the consented buildings are taller than the operative 18m maximum height where within 20m depth of the Carrington Road frontage and four are taller than the operative 27m maximum height where 20m or greater from

the frontage. Ground floor uses to Carrington Road within the buildings include a 1,500m<sup>2</sup> metro sized supermarket and small retail units with a combined gross floor area (GFA) of 1,600m<sup>2</sup> (RC1 and RC2 total retail GFA of 3,100m<sup>2</sup>). The RC1 and RC2 buildings establish a changed urban context of larger scale residential buildings with active (non-residential) retail uses at ground floor.

- 14 These consented 7 – 10 storey buildings occupy 280m (39%) of the 716m frontage of the precinct to Carrington Road between Gates 1 and 4 (being that part of the precinct's frontage to Carrington Road, south of the Former Oakley Hospital Building, with contiguous existing or proposed Business – Mixed Use (BMU) zoning). They will significantly change the existing character of the road to one of urban scale buildings. Visual simulations of the buildings prepared for the consent applications (refer Figures 2 – 4 below) show the degree of change, with the RC1 and RC2 buildings appearing as a continuous edge along the western side of Carrington Road when approaching from the north and from the south, with the break between the developments along the road not visible from the selected positions.



Figure 2: Looking south along Carrington Road from the intersection with Sutherland Road to the RC2 development in the foreground and the RC2 development in the background. Image source: Maungārongo RC1 and RC2 Assessment of Landscape Effects.



Figure 3: Looking north along Carrington Road from outside Gladstone Road Primary School to the RC1 development in the foreground and the RC2 development in the background. Image source: Maungārongo RC1 and RC2 Assessment of Landscape Effects.



Figure 4: Looking north along Carrington Road from existing Gate 4 to Unitec, just north of Seaview Terrace. The RC1 development is to the fore and the RC2 development is in the background. Image source: Maungārongo RC1 and RC2 Assessment of Landscape Effects.

- 15 The building scale enabled by the plan change is consistent with that, in character terms, of the intensified urban scale of the consented Maungārongo RC1 and RC2 buildings.

**Precedents**

Examples of non-central city buildings of the scale proposed along Carrington Road are requested.

*Response*

- 16 Examples include the 10 storey Ockham 'The Greenhouse' apartment building at 16-20 Williamson Avenue in Ponsonby and two 9 storey apartment buildings with ground floor retail on Greenlane West, adjacent Alexandra Park in Greenlane, designed by RTA Studio.

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Both developments share characteristics in common with the precinct. They are located outside the city centre in areas identified for urban intensification, on main roads of similar width to Carrington Road, and close to centres which offer a range of amenities. They are also located within BMU zoned sites. The Greenhouse Building is on a site with a 27m Height Variation Control (with the consented Greenhouse building being well above this – refer Figure 5 below). The Alexandra Park buildings are on land with a 35m Height Variation Control along an approximately 450m length of Greenlane West. Additionally, they are opposite THAB zoned land, although with a lower 16m permitted height (outside a PC78 six storey walkable catchment) and opposite a Special Purpose – Healthcare Facility and Hospital zoned site (Greenlane Hospital) with a 25m height area enabled to the road frontage.

- 17 Additional examples, as they now form part of the existing environment, are the 7-10 storey Maungārongo RC1 and RC2 buildings (refer Attachment 2 images).



Figure 5: Elevation from Council approved plan set (LUC60339808) for 10 storey 'The Greenhouse' apartment building (to the right).



Figure 6: 9 storey apartment buildings with retail ground floors on Greenlane West.

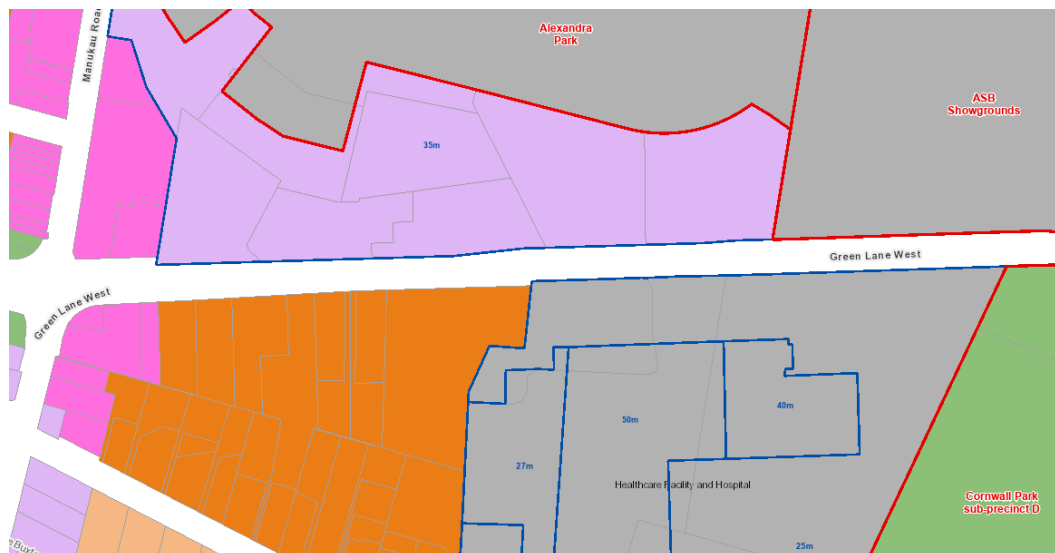


Figure 7: Operative zoning plan for the Alexandra Park apartment buildings showing the 35m Height Variation Control land it is located on (purple).

**Changes in level relative to Carrington Road**

- 18 Land along the precinct's Carrington Road frontage generally falls away from the road. The cross sections within Attachment 1 to the UDA assume a finished ground level height level with Carrington Road and therefore present a conservative scenario of building bulk relative to the road. There are few areas of developable land adjoining Carrington Road within the precinct which are relatively flat and level with it to any great depth. To the south of the Former Oakley Hospital Building and north of Gate 2 is an area of such land which is 130m – 150m deep. This is the only part of the precinct south of the Former Oakley Hospital Building that rises up from Carrington Road. It has a gentle 3m slope up to a point at 90m depth from the frontage. This length of frontage is where the four Maungāroho RC2 buildings have been consented (now forming part of the existing environment) and will be largely occupied by those buildings. South of this, there is rolling (8-15 degree slope) to strongly rolling (16-20 degree slope) land falling down from the Carrington Road frontage to the Taylors Laundry site. Continuing south through to Gate 4, land steps down from Carrington Road in a series of discrete flat to gently undulating platforms, with few of significant width adjoining the frontage, separated by short undulating to rolling breaks (up to 15 degree slope – typically considered undesirable for building purposes). From Gate 4 through to Woodward Avenue, the fall away from Carrington Road is more pronounced and steep.
- 19 The practical effect of the confined areas of flatter land adjoining Carrington Road is that there is a first line of buildings adjoining Carrington Road with ground floors generally level with it. Immediately to the west of this buildings will step down with the slope, managing and reducing overall building scale as seen from the road.
- 20 Refer **Attachment 3**: Elevation Map and Slope Map.

**Attachment 1: Storey height**

- 1 The request for further information refers to an 18m building height accommodating 5-6 storeys and a 27m building height accommodating 8-9 storeys. It is considered that in assessing the potential effects of building scale, height in metres is the primary consideration, as this is objectively measurable and quantifiable, whereas height in storeys may differ depending on a combination of factors (as is discussed below). Notwithstanding this, it is considered that 18m typically accommodates 5 storey buildings (not up to 6 storeys) and 27m typically accommodates 7-8 storeys (not up to 9 storeys), as also seen in the existing Maungāroho RC1 and RC2 consents.
- 2 Total building height is comprised of the following elements:
  - (a) the height of the ground floor, including any above ground foundation structure;
  - (b) the height of upper floors; and
  - (c) height for roof structure.
- 3 In the writer's experience, floor to floor heights of upper levels used for residential purposes in contemporary apartment buildings vary from a minimum of 2.95m to 3.5m. A 3.2m floor to floor height on residential levels is common, with heights generally in the range of 3.1m – 3.3m.
- 4 Ground floor heights in residential apartment buildings vary depending on site slope, how building services are integrated, and whether the floor accommodates any non-residential use such as retail (as is enabled in both the operative Wairaka Precinct and the plan change provisions). Depending on a combination of these factors, ground floors may be up to around 5m in height.
- 5 The height of roof structures can vary widely but are typically up to 1.5m (and are often taller where used as part of the design/architectural expression of the building).
- 6 For more detailed analysis, refer also to the Boffa Miskell 21 July 2022 report entitled '6 Storey Apartment Buildings: Auckland Case Studies', which was a supporting document to the Auckland Council Residential and Business zones s32 Evaluation Report of PC78, and is at page 221 of that document.<sup>1</sup> The report refers to a survey of nine 6 storey buildings, finding that their total height, based on a combination of the factors described above, varied from 19.55m to 23m – i.e. all above the 18m for 6 storeys the request for further information refers to. (For clarity, it is not out of the question that 6 storey buildings can be accommodated within 18m where a site is flat and where very efficient construction systems are used, however, in the writer's experience, this is not common.)
- 7 Based on a reasonably conservative 3.1m residential upper level floor to floor height, with a reasonable height at the ground floor of 4.5m (assuming some site slope, foundation structures, and design flexibility to accommodate retail uses), with additional roof structure of 1m, results in:
  - (a) a 5 storey building being accommodated within 18m (total height 17.9m);

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<sup>1</sup> This report is available on the Council website at: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=140>

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- (b) a 6 storey building being 21m in height (the same height proposed in PC78 for buildings of 6 storeys within walkable catchments: refer PC78 THAB zone rule H6.6.5(1)(c)); and
  - (c) a 7 storey building being 24.1m in height and an 8 storey building being 27.2m in height (being respectively 2.9m less and 0.2m more than the 27m maximum building height proposed by the plan change in Height Area 4).
  - (d) a 10 storey building being 33.4m (being 1.6m less than the 35m maximum building height proposed by the plan change in Height Area 2).
- 8 As noted, the above are reasonably conservative estimates of the number of storeys that may be achieved at the given heights. A small increase in ground floor height to 5m, upper level floor to floor height to 3.2m, and roof structure to 1.5m results in 5 storeys in 19.3m, 6 storeys in 22.5m, 7 storeys in 25.7m, 8 storeys in 28.9m, and 10 storeys in 35.3m.
- 9 In VS10 and VS11 in the Landscape and Visual Effects Graphic Supplement these variabilities in floor to floor and roof heights are represented in an averaged ground floor and upper level floor to floor height of 3.6m.
- 10 The consented Maungārongo RC1 and RC2 buildings are relevant to the discussion points above as examples of floor to floor and total buildings heights of contemporary residential apartment buildings:
- (a) Building 1 (in RC1 – street adjoining part) is 7 storeys and has a total building height of approximately 25m. It has a ground floor height of 5m, which accommodates (in part) retail use, and 3.2m floor to floor upper residential levels. Its roof structure accommodates the building's top floor in a pavilion type form.
  - (b) Building 3 (in RC2) is 7 storeys and has a total height of approximately 26m. It has a relatively compact 3.6m ground floor height which accommodates (in part) retail use, 3.1m floor to floor upper residential levels, and a roof structure of up to 2.5m in height.
  - (c) Building 5 (in RC2) is 9 storeys and has a total height of approximately 30.5m. It also has a 3.6m ground floor height which accommodates (in part) retail use, and 3.1m floor to floor upper residential levels. Its roof structure is 1m in height.



**Attachment 2: Maungārongo resource consents 1 and 2**

- 1 On 29 March 2023 the Marutūāhu-Ockham Group, on behalf of the Marutūāhu Rōpū, gained two resource consents via the Fast-track Act listed project consenting process for several multi-level apartment buildings (with supporting ground level commercial / retail activities) along the Precinct's Carrington Road frontage.
- 2 The purpose of the discussion below is to provide a summary of the consented developments as relevant to UD5 (and of broader relevance to an urban design assessment of the plan change). Copies of the consent decisions and application documents for both resource consents are available on the Environmental Protection Authority website at <https://www.epa.govt.nz/fast-track-consenting/listed-projects/>.
- 3 The urban design statement provided as part of the lodgement documentation for the developments was prepared by Ockham Architects and the Landscape and Visual Effects Assessment (LVEA) was prepared by Peter Kensington (Kensington Planning and Landscape Consultants Ltd / KPLC), with Mr Kensington concluding in both assessments that the buildings were appropriate and would make an overall positive contribution to the landscape character and values of the site and of the wider Wairaka Precinct (refer to the website link above for a copy of the LVEAs).
- 4 The Maungārongo resource consent 1 ('RC1') development site is located midway along the precinct's Carrington Road frontage directly to the north of Farm Road / Gate 3. The Maungārongo resource consent 2 ('RC2') development site is located towards the northern end of the precinct's Carrington Road frontage directly to the north of Gate 2 and to the south of the consented intersection of the new Gate 1 road with Carrington Road. Refer Figure 1 below.



Figure 1: Location of Marutūāhu-Ockham's RC1 and RC2 development sites along the precinct's Carrington Road frontage. Image source: Maungārongo RC1 and RC2 application documents.

**Maungārongo resource consent 1**



Figure 2: Render of the Maungārongo RC1 buildings as seen from Carrington Road. Building 1 East is in the foreground with the western tower of Building 1 behind. Building 2 is to the right of the picture. Image source: Maungārongo RC1 Urban Design Statement.

- 5 RC1 (BUN60412010) comprises two 7 – 9 storey buildings, with a total of 381 apartments, a 1,500m<sup>2</sup> 'metro-sized' supermarket, and a total of 1,136m<sup>2</sup> of 11 small retail premises.
- 6 Building 1 (to the south) comprises two 'towers' (as referred to in the application's Assessment of Environmental Effects) above a one storey podium separated by a 19m wide space: a 7 storey (including podium) eastern tower and a 9 storey (including podium) western tower:
  - (a) The eastern tower of Building 1 ('*Building 1 East*'), being that part of the building closest to Carrington Road, has a total maximum height of approximately 25m, infringing the Wairaka Precinct's 18m maximum height within 20m of the Carrington Road frontage by approximately 7m. The building has a 4.3m setback from the future road extent, post-widening. It has a 6 storey façade to the street (total parapet height approximately 22.5m) with a 4m setback to the seventh floor.
  - (b) The western tower of Building 1 has a total maximum height of approximately 34m, infringing the operative maximum 27m height where 20m or greater from the Carrington Road frontage by approximately 7m.
  - (c) Building 1 contains 219 apartments, six small retail premises, one small office space, and the metro-sized supermarket.
- 7 Building 2 (to the north) comprises two 'towers' above a one storey podium separated by a 19m wide space: a 7 storey (including podium) eastern tower and a 9 storey (including podium) western tower.
  - (a) The eastern tower of Building 2 ('*Building 2 East*'), being that part of the building closest to Carrington Road, has a total maximum height of approximately 25m, infringing the Wairaka Precinct 18m maximum height where within 20m of the Carrington Road frontage by approximately 7m. The building has a 6 storey façade to the street (total

parapet height approximately 22.5m) with a 4m setback to the seventh floor. It has a 2.5m setback from the post road widening boundary.

- (b) The western tower of Building 2 has a total maximum height of approximately 33.5m, infringing the operative maximum 27m height where 20m or greater from the Carrington Road frontage by approximately 6.5m.
- (c) Building 2 contains 162 apartments, five small retail premises, and two small office spaces.

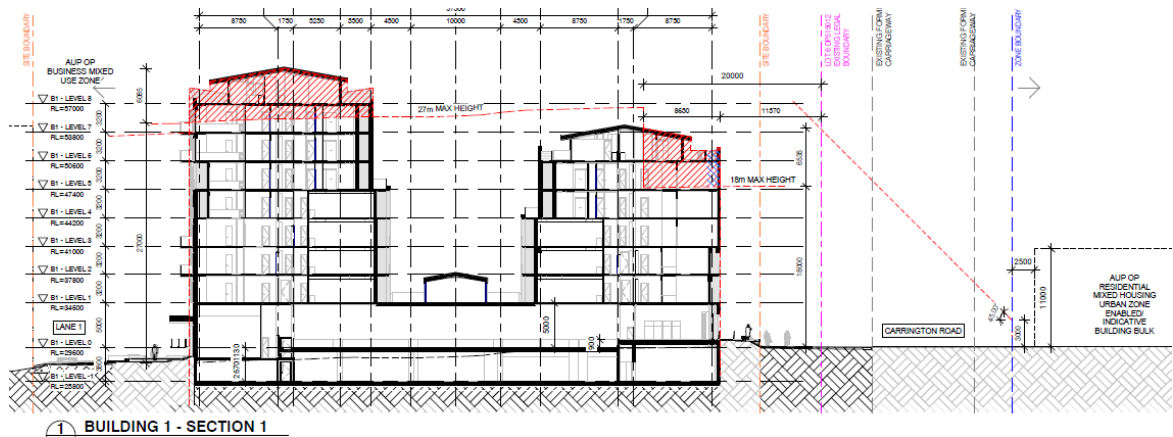


Figure 3: Section through Maungāroho RC1 Building 1 showing overall building height and infringements (red hatched) of the Wairaka Precinct operative 18m and 27m height areas. Image source: Maungāroho RC1 architectural drawings.

**Maungāroho resource consent 2**

- 8 RC2 (BUN60412010) comprises four 7 - 10 storey buildings, set 5.3m back from the Carrington Road frontage (post road widening) with a total of 266 apartments and 464m<sup>2</sup> of 6 small retail premises.
- 9 Building 3 (the northernmost building) is 7 storeys in height. It has a total maximum height within the operative 18m height area of approximately 26m, infringing the standard by approximately 8m. It has 65 apartments and 2 small retail units.
- 10 Building 4 is 10 storeys in height. It has a total maximum height of approximately 36m, infringing the operative 18m maximum height standard by approximately 18m. It has 77 apartments and 2 small retail units.
- 11 Building 5 is 9 storeys in height. It has a total maximum height within the operative 18m height area of 30.5m, exceeding the standard by approximately 12.5m. It has a total maximum height within the operative 27m height area of 29m, infringing the standard by approximately 2m. It has 69 apartments and 2 small retail units.
- 12 Building 6 (the southernmost building) is 7 storeys in height. It has a total maximum height within the operative 18m height area of approximately 25m, infringing the standard by approximately 7m. It has 55 apartments.

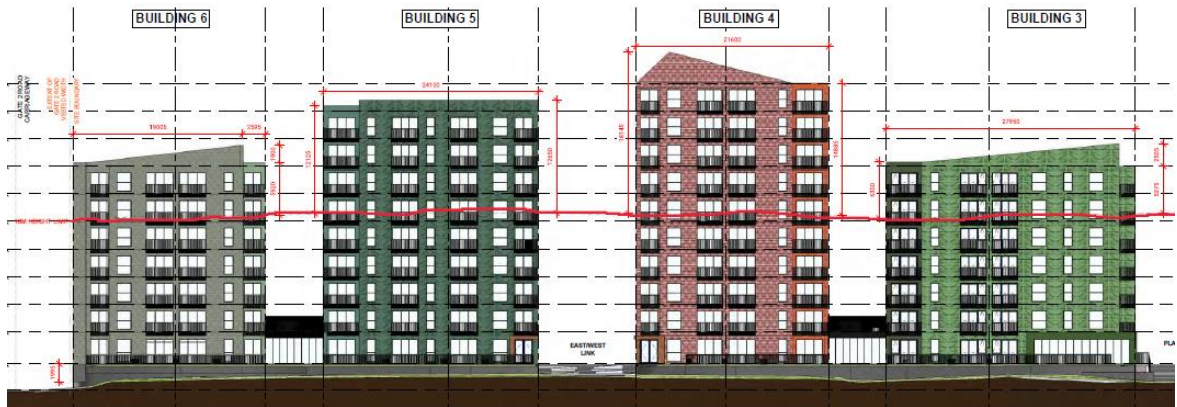


Figure 4: East Elevation of Maungārongo RC2 Buildings 3-6 to Carrington Road. The red line is the Wairaka Precinct's operative 18m height area along Carrington Road. Image source: Maungārongo RC2 architectural drawings.



Figure 5: Render of the Maungārongo RC2 development (showing Buildings 3-5) as seen from Carrington Road. Image source: Maungārongo RC2 architectural drawings.

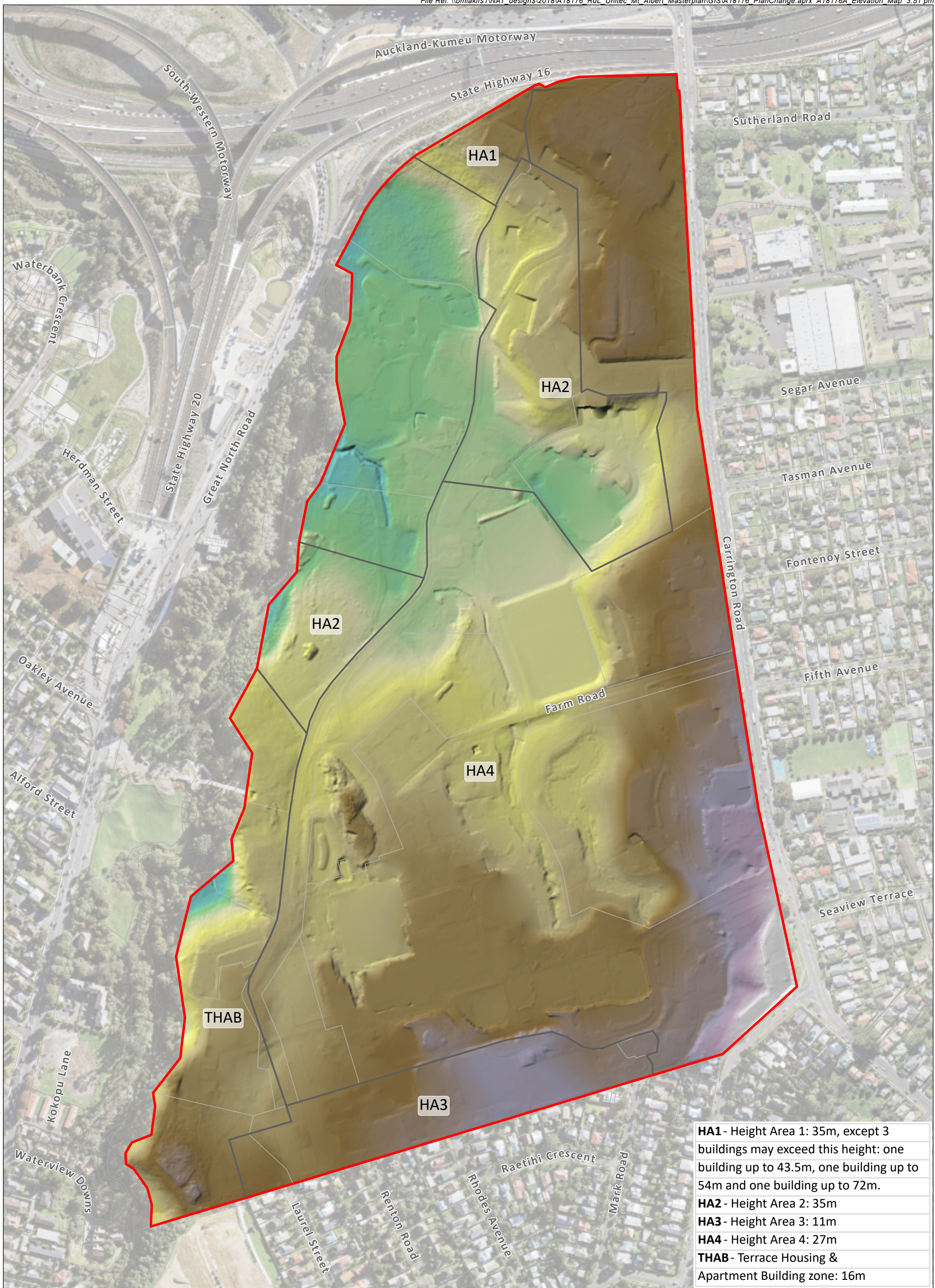
**Attachment 3:** Elevation Map and Slope Map

This plan has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use in accordance with the agreed scope of work. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.



**HA1** - Height Area 1: 35m, except 3 buildings may exceed this height: one building up to 43.5m, one building up to 54m and one building up to 72m.  
**HA2** - Height Area 2: 35m  
**HA3** - Height Area 3: 11m  
**HA4** - Height Area 4: 27m  
**THAB** - Terrace Housing & Apartment Building zone: 16m

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<b>HA1</b> - Height Area 1: 35m, except 3 buildings may exceed this height: one building up to 43.5m, one building up to 54m and one building up to 72m.
<b>HA2</b> - Height Area 2: 35m
<b>HA3</b> - Height Area 3: 11m
<b>HA4</b> - Height Area 4: 27m
<b>THAB</b> - Terrace Housing & Apartment Building zone: 16m

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
***Amending I334 Wairaka Precinct***

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD6
<b>Specific request</b>	Please provide clarification as to how retail and community facilities will be appropriately provided, size and located to serve the needs of the scale of community enabled by the retail provisions.
<b>Reasons for request</b>	<p>The Precinct Plans do not show the proposed location of retail or other community facilities within the Precinct.</p> <p>With a potential population of 10,000+ residents and with parts of the site not within easy walking distance of Pt Chev or Mt Albert centres, the role of retail and supporting uses (such as early childhood education, medical / healthcare) will become critical to the success of this community.</p> <p>Acknowledging that the Business Mixed Use Zone provides some enabling provision it is difficult to understand the amount and location of such uses, how people will be able to access them (noting car ownership is intended to be low and walking will be promoted) and how these will be successfully integrated into the neighbourhood. The provision of these facilities could help to create a heart / gathering place for this new community and be the centre-piece of the neighbourhood. But there is little to no discussion around the amount, location and design principles that will need to be employed to ensure a successful "centre" is created.</p> <p>Related to this is the issue of walkability. The centres of Pt Chev and Mt Albert are relatively close, but not necessarily accessible by walking. There is no analysis around the actual walking catchment from these centres, how much of Te Auaunga precinct falls within these catchments and the safety, efficiency and quality of connections required / to be provided. This will help determine the amount of services required on the site as well as the provision of pedestrian / cycle routes within and to / from the site.</p> <p>The above assessment should make comment about the EPA applications currently being processed include provision for retail. They should be assessed as to their appropriateness in meeting, or partly meeting, the ultimate needs of the precinct as a whole.</p> <p>(see also EA1 and P9)</p>



**Applicant response provided by** John Duthie, Tattico

**Applicant response**

**Context - retail location**

- 1 This question is closely related to question E1.
- 2 Mr Heath of Property Economics has undertaken an analysis of retail provision within the precinct. His response is set out at E1 and E2. That work is not repeated here but is relied on in terms of answering the questions in terms of the scale of retail activity.
- 3 The location of retail activity does not change the existing location of retail within the Wairaka Precinct provisions, which was considered in depth through the original precinct creation. The planning analysis as part of this plan change has confirmed that the original location remains the appropriate centralised provision for the hub.
- 4 The context to this was that when the Auckland Unitary Plan (Operative in Part) (*AUP*) was first developed and the provisions of the Wairaka Precinct contemplated, there was the desire to reinforce the town centres of Point Chevalier and Mount Albert, and not to dissipate economic activity by the inappropriate location or size of an alternative retail facility within the precinct.
- 5 The National Policy Statement on Urban Development 2020, Regional Policy Statement and zoning provisions within the AUP all reinforce the Council's growth strategy of targeting growth around existing town centres and on key high frequency public transport routes.
- 6 However, there was a recognition that with the original expected projected population within the precinct, plus the Unitec campus population, plus the associated Unitec business park, that a level of local retail services was necessary to provide for the needs of the community.
- 7 This retail facility was located adjacent to Gate 3 on the currently named "Farm Road". This location was seen as appropriate given:
  - (a) It is essentially midway between the Mount Albert and Point Chevalier town centres. Therefore it assisted in filling in the gap in the walkable catchment for the two town centres.
  - (b) By locating it in the Gate 3 vicinity adjacent to Carrington Road, it was able to service both the existing community east of Carrington Road, and the new community.
  - (c) Carrington Road will also become an enhanced public transport corridor, assisting with access.
  - (d) With the new backbone consent and the enhanced walking and cycling connections, the retail location is located on a committed separated cycleway network and with good pedestrian connections.

**The plan change**

- 8 The additional intensification provided for in this plan change:

- (a) is along Carrington Road and central to the precinct, so will have good access to the node at Farm Road, including along the internal consented walking and cycling networks as noted above, or along the upgraded Carrington Road networks; and
  - (b) is in the north, within easy walking distance of the existing town centre at Point Chevalier.
- 9 Other retail opportunity is provided within the precinct. In particular:
- (a) The Unitec campus has existing retail provision and is able to expand its retail offer targeted to the student / staff population complemented by general public.
  - (b) The opportunity for some retailing is available as part of adaptive reuse, particularly of the Former Oakley Hospital Building.

**Existing consents**

- 10 The clause 23 request seeks feedback on the existing consents.
- 11 Consent has recently been granted for a mixed use development including a retail hub in the location referred to above. It is not for this plan change process to comment on existing consents other than to note that the approved resource consent by Marutūāhu (RC1) has consented a small supermarket and associated specialty shops as part of that development. Effects in terms of size and location of the retail were evidently examined as part of the processing of that consent. The Panel, for reasons set out in their decision, approved the consent.
- 12 The plans forming part of the application, the consent itself, and the Hearings Panel report, are all public record and available to the assessors of this private plan change request.<sup>1</sup>

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<sup>1</sup> Refer to the EPA webpage here: <https://epa.govt.nz/fast-track-consenting/listed-projects/maungarongo-rc1/>.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD7
<b>Specific request</b>	Please clarify how a range of housing types can be secured.
<b>Reasons for request</b>	Successful neighbourhoods rely on a range of typologies, sizes and tenures. A precinct dominated by one typology could create unwanted social and design outcomes, especially if dominated by small one-bedroom apartments. It is not clear what mechanisms / controls will be employed to manage / deliver a range of typologies, particularly if buildings are being provided by different parties.
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell and John Duthie, Tattico
<b>Applicant response</b>	
1.	There is considered to be no urban design or planning rationale to require (as opposed to enable) a range of housing types within the precinct.
2.	The precinct description states that the purpose of the precinct, amongst other matters, is to provide for a diverse, compact urban residential community. Furthermore, that the precinct will provide for a variety of housing typologies which help cater for Auckland's growth and the diverse community that will establish in this location.
3.	Key to the above is that the precinct enables a range of residential forms. However, it does not require a specified mix of typologies nor require houses with a specified range of bedroom numbers. This is consistent with the enabling approach to housing provision used in the Auckland Unitary Plan (Operative in Part) (AUP).
4.	The use of a prescriptive framework that secures, for example, a specific percentage of certain housing types is considered to be insufficiently flexible, and likely to lead to perverse outcomes. The precinct is part of the wider Mount Albert, Point Chevalier and Waterview neighbourhoods where there are considerable volumes of single-storey two to three+ bedroom stand-alone houses. If this remains the case for the next 10 - 15 years, then the precinct development will be an opportunity to provide for a wider range of housing typologies, including provision of one bedroom dwellings, currently significantly unprovided for in this location.
5.	We are unaware of any AUP zone or precinct that prescribes a specific range of housing typologies or dwellings with a specific range of bedroom numbers. There are no unique characteristics within the plan change area that require a different approach in Te Auaunga Precinct.

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
***Amending I334 Wairaka Precinct***

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	UD8
<b>Specific request</b>	Please provide up to date maps.
<b>Reasons for request</b>	The Precinct Plan maps are all based on old cadastral maps that do not show SH16. This makes it difficult to fully assess the spatial relationships at the northern part of the site. The maps should be updated to reflect the current environment.
<b>Applicant response provided by</b>	
<b>Applicant response</b>	
1	Updated Precinct plan maps have been provided together with the revised plan change provisions as part of the clause 23 response package.

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
***Amending I334 Wairaka Precinct***

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

UD9

**Specific request**

It is a concern that the plan change is not based on an explicit vision for the type of community envisaged. There is no master plan provided and thus little confidence that each part of the site will be developed within an overall plan that ensures adequate provision of facilities for all of the community and recognition of the local and wider context within which each development should be assessed.

Whilst it is acknowledged that this proposed Precinct Plan is an amendment of an existing plan, the current precinct does not anticipate the levels of (predominantly) residential development now proposed.

A new community is proposed of 4,000+ dwellings / 10,000+ people. This is a significant development (a medium sized town in New Zealand terms) and delivering such a community in a well-functioning urban environment is a complex process.

A masterplan would typically be expected for such a project to demonstrate how all the elements are expected to come together to produce good urban outcomes.

It is not clear at what point the overall / high-level design approach to this site can be assessed by Council.

It is assumed that if successful, this Precinct Plan will then allow for individual consents to be submitted. At that point, assessment of the bigger picture will not be possible, which means that this stage of the process is the only time to assess the design qualities of the intended approach.

The two most successful large-scale urban environments in Auckland in recent times have both been guided by comprehensive masterplans and associated design quality controls and processes – Wynyard Quarter and Hobsonville Point.

Yet for this Precinct, no masterplan is supplied and the provisions within the Precinct Plan and the AUP are being relied upon to deliver quality design outcomes.

For clarity, a “masterplan” is not simply a pretty illustration showing the intended buildings, streets, landscape etc. It is understood such a picture is hard to produce for multiple landowners and represents just one potential scenario at a point in time.

On the contrary, a masterplan is a complex document with many parts, including a framework to guide development over a long time that allows for flexibility and adaptability to changes in market demand.

But a masterplan should provide:

- A clear vision and design principles, against which all subsequent developments are assessed.
- A three-dimensional framework to guide the location of open space, uses, movement and buildings, including identifying development parcels in the form of words and plans / images.
- An implementation plan defining the delivery strategy and staging as well as the design quality control process – e.g., the use of design guides or design panels.

Without this information it is difficult to assess the proposed urban design qualities of the Precinct.

It is hard to understand if this Precinct is intended to function as a new community in its own right, or whether it is simply new (predominantly) residential development that is intended to support and rely on existing neighbouring services and amenities. Although this may be a subtle point, it is vital in understanding how the Precinct will be designed and what ancillary services will be required, where they will be located and how they will be integrated.

The assessments provided are unclear on this point. In parts, it suggests this is intended to function as a new community in its own right.

“A complete community, providing the opportunity for people to live, work and learn within the precinct, while benefiting from access to public transport and a well-connected walking and cycling network.”  
P.16 UD Assessment

Yet there is little discussion on the provision of ancillary services to support a community such as schools, early childcare education, medical / healthcare, employment and what is the appropriate level of retail. It is understood there is a tension between providing competition to nearby local centres and providing sufficient on-site facilities to avoid excessive vehicle movements. A retail demand study would help to assess the appropriate levels.

It would also be helpful to understand the proposed design quality control process. As stated above, successful new precincts often rely on a combination of design guides and design panels. With such a large precinct, reliance on the AUP and basic consenting process alone is unlikely to result in consistently high-quality design outcomes and an urban environment that is more than just a collection of buildings.

See also P9 and P10.

**Applicant response provided by**

John Duthie of Tattico, Rachel de Lambert and Matt Riley of Boffa Miskell

**Applicant response**

- 1 This matter is raised by the Council as a non-clause 23 issue. Essentially the issue raised is that:
  - (a) the plan change is not based on a “vision” for the land; and
  - (b) there is no masterplan that can inform the progress of the plan change and that a masterplan is a critical element.
- 2 This response provides detail on the significant work that HUD and the future developers of the land under Treaty settlement, the Marutūāhu, Ngāti Whātua and Waiohū-Tāmaki Rōpū have carried out to date in relation to these matters, noting that as the Crown has purchased the land the subject of this application from Unitec, it is no longer required for tertiary education. The Crown also purchased the Sub-precinct B land (Taylor’s Laundry), so that when its lease expires it can be integrated into the future housing development. The plan change seeks to ensure land which is held by the Crown for housing under the Housing Act 1955 can be developed for housing, rather than retain its current education zoning.

**Vision**

- 3 HUD disagrees that this plan change is not based on a vision for the land. For context, the Crown will transfer this land to the Rōpū for development as required under its Treaty settlement obligations to them, which are contained in the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed 2012 and Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. Those obligations anticipate the Rōpū being provided with the development opportunity at the precinct.
- 4 At the overarching level in the hierarchy, the shared vision for the land is contained in the Reference Masterplan and Strategic Framework, produced jointly by the Rōpū and the Crown in 2019. That vision is “He hononga tika ki te hangai ngā hapori toitū me he tāone taioereore mai ngā auahatanga me ngā ahurea taukiri o te hapori: A true partnership to establish inclusive, sustainable communities and world class city building through vibrant and innovative place-making”.
- 5 The vision identifies the values and principles that will be applied to the plan change, as well as the key structuring moves. However, the Reference Masterplan and Strategic Framework envisages a project that will advance and evolve around its key values and principles, which are not suitable for embedding into a planning framework.
- 6 The shared vision for the land addresses the following core elements, outlined in further detail below:

- (a) cultural;
- (b) social; and
- (c) environmental.

*Cultural*

- 7 The vision for this land is based on cultural parameters, including:
- (a) restoration of ownership of this land to iwi;
  - (b) the opportunity for Māori economic development, which is strongly leveraged through this plan change; and
  - (c) Māori cultural promotion of the land.
- 8 This vision and over-arching cultural objective is clearly outlined within the objectives and policies of the precinct as proposed to be amended through the plan change. For example:
- (a) Proposed new Objective 10(f) directs that an integrated urban environment is created which contributes to Māori cultural promotion and economic development.
  - (b) Proposed new Objective 12 seeks that the restoration and enhancement of Māori capacity building and Māori cultural and economic development within the precinct is provided for, promoted and achieved.
  - (c) Policy 4(e) is proposed to be amended to specifically include supporting Māori capacity building and Māori cultural promotion and economic development.
  - (d) Policy 5 is proposed to be amended to specifically include Māori as a group for which opportunities for employment growth will be created through the precinct provisions.

*Social*

- 9 As noted above, part of the vision is to establish an integrated and diverse community. The application of the Business – Mixed Use zone enables a residential focus for the land but also enables the opportunity to create employment, retail and other community and servicing activities integrated into the predominantly residential development.
- 10 The residential vision for the precinct is that a mix of social housing, a range of affordable housing, and full market housing will be provided. Over time it is expected there will be a diverse range of typologies. The combination of a mix of typologies and a range of price points is expected to help encourage a diverse community within the neighbourhood.
- 11 Similarly, there is a shared vision in respect of both quality access for all modes - cycling, pedestrian and vehicular access – as well as commitment to improved connectivity within and between the precinct and the adjacent neighbourhoods (which has been demonstrated in respect of the enabling works resource consents and delivery on these to date within the precinct).
- 12 These aspects of the vision are included within the objectives and policies of the precinct as proposed to be amended through the plan change. For example:
- (a) Objective 3 is proposed to be amended to specifically refer to providing for a variety of built form typologies.



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- (b) New Objective 13 seeks to provide for increased heights in appropriate parts of the precinct so as to provide greater housing choice, increase land efficiency, benefit from the outlook from the precinct, and create 'landmark' buildings in the north western part of the precinct.
- (c) Existing Policy 6 relates to encouraging a mix of residential lifestyles and housing typologies, with amendment to specifically refer to encouraging a high density residential community.
- (d) New Policy 14B seeks to provide for additional height in the central and northern parts of the precinct, recognising the topographical and locational characteristics of this part of the precinct, and the ability to provide greater housing choice, increase land efficiency, benefit from the significant views and outlook from the precinct, and leverage the proximity and amenity of Te Auaunga.
- (e) Key roading, walking and cycling connections are identified on Precinct plan 1.

### *Environmental*

- 13 The precinct vision also seeks enhanced environmental outcomes in terms of stormwater management, erosion and sediment control, and the incorporation of environmental outcomes into the landscape.
- 14 These are set out in the objectives and policies in the plan change, and also recognised in the standards, and explicitly within the assessment criteria. For example:
  - (a) Objective 10(b) seeks that the environmental attributes of the precinct are protected and enhanced in its planning and development.
  - (b) Objective 10(c) seeks that adverse effects of the environment and existing stormwater, wastewater and road/s infrastructure are avoided, mitigated and remedied.
  - (c) Policy 10 enables subdivision and development that is compatible with and sensitive to the ecological qualities of Te Auaunga and the Motu Manawa Marine Reserve.
  - (d) Policy 14 requires proposals for new, or additions to existing, buildings, structures and infrastructure adjoining or adjacent to the significant ecological area of Te Auaunga to provide appropriate native landscaping and contemporary high-quality design, which enhances the precinct's built form and natural landscape.
  - (e) Specific stormwater standard I334.6.3 requires all subdivision and development to be consistent with an approved stormwater management plan.
  - (f) Proposed new matters of discretion relating to all new buildings at I334.8.1(1A) include provisions related to stormwater management, landscaping, and controls over built form.

### *Vision summary*

- 15 There is a clear vision for the land. This is reflected in the objectives and policies of the plan change and is carried through into the activities, standards, assessment criteria and the Precinct plans themselves, noting that there are a wide range of matters which are beyond the scope of the Resource Management Act 1991 (*RMA*) which are also relevant to creating a new community at this location.

- 16 As noted above, the collective vision has already been used to inform the:
- (a) enabling works resource consents granted to the Marutūāhu Rōpū and the Waiohua-Tāmaki Rōpū (referred to in the plan change application) and associated delivery on these to date within the precinct; together with
  - (b) the Maungārongo resource consent 1, Maungārongo resource consent 2, and Wairaka Precinct Stage 1 fast-track consents recently approved under the COVID-19 Recovery (Fast-track Consenting) Act 2020.
- 17 The Council feedback does not ask for any more information on the various aspects of the existing vision. It is HUD's view that the relevant RMA planning aspects of the vision are set out within the plan change as lodged.

**Masterplan**

- 18 The master-planning of the precinct spans over the last decade and has included the preparation of two complete masterplans.
- 19 Oculus was originally engaged by Unitec and then the Wairaka Land Company between the years of 2013 to 2018 to form, in collaboration with Boffa Miskell, a masterplan for the land to meet the then growing tertiary education, business, residential and recreational demands.
- 20 This work informed the development of the operative Wairaka Precinct through the Proposed Auckland Unitary Plan process.
- 21 The relevant RMA aspects of that masterplan were distilled down into the current operative Wairaka Precinct provisions, including Precinct plan 1.
- 22 That distillation included:
- (a) identification of the key connections into the precinct, particularly the road interchanges along Carrington Road;
  - (b) the internal street network;
  - (c) the location and extent of public and private open space;
  - (d) the protection of key trees and ecological areas;
  - (e) connections to Te Auaunga (Oakley Creek) parkland and walkways;
  - (f) stormwater management;
  - (g) the location of a core retail area;
  - (h) cycleways and walkways;
  - (i) special yard setbacks from the southern boundary and Te Auaunga (Oakley Creek); and
  - (j) Carrington Road set back.
- 23 When the Crown purchased the land for housing, it worked with the three Rōpū to develop an updated masterplan, reflecting the new direction and intention for how the precinct was

## Responses to Auckland Council RMA cl 23 Requests | UD9 | 7

to be developed and incorporating the vision, values and principles of the Rōpū into the plan. A new masterplan was prepared by Grimshaw (Sydney) in collaboration with Boffa Miskell in 2019. That masterplan has been made publicly available and sits within the Ministry of Housing and Urban Development's website relating to the Carrington Road properties.<sup>1</sup>

- 24 As with the original Oculus masterplan, the key RMA aspects have been distilled from the Grimshaw masterplan into the precinct provisions and Precinct plans as proposed to be amended through the plan change.
- 25 In particular:
- (a) The core entrances off Carrington Road have been confirmed (with a small refinement to the alignment of the Gate entrances).
  - (b) The cycleway and walkway network has been adjusted to reflect the new approach on the Unitec campus and expanded in the north to address the extended cycleway network.
  - (c) Stormwater management has been included within the plan change taking account of the Healthy Waters' more recent approaches to stormwater management.
  - (d) The open space network has been refined acknowledging the significant opportunity to substantially increase the area of public open space (subject to Council approval to acquisition).
  - (e) The different parts of the precinct suitable for different height of development have been carefully defined and included within the Precinct plan.
  - (f) The Carrington Road widening setback (8m width) is confirmed (and in fact these upgrade works, primarily for public transport, cycling and walking are now funded by the Crown).
  - (g) The Te Auaunga (Oakley Creek) set back is confirmed.
  - (h) The access to Te Auaunga (Oakley Creek) is protected. The access is built and the related section of formerly piped stream daylighted as an early establishment project.
  - (i) The southern yard is confirmed. The stone wall within this yard is also proposed to be retained as set out in the clause 23 response HH2.
- 26 The Grimshaw plan has also informed the urban design analysis and assessment by Boffa Miskell of the plan change (who were closely involved in that master-planning process), and the detailed assessment criteria proposed to be included in the precinct as part of the plan change.
- 27 Accordingly:
- (a) The key planning information is now reflected in the precinct provisions and Precinct plans themselves, as these are proposed to be amended through the plan change.

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<sup>1</sup> A Reference Masterplan & Strategic Framework: Ngā Mana Whenua o Tāmaki Makaurau & Crown, Grimshaw, 4 February 2019. Available at: <https://www.hud.govt.nz/our-work/carrington-residential-development/>.

## Responses to Auckland Council RMA cl 23 Requests | UD9 | 8

- (b) That is all that is required and appropriate for this plan change stage. This is not a resource consent. No buildings are approved as part of this plan change application. It is not appropriate to seek the level of detail that would apply to a resource consent. In our view the key planning parameters are included within the precinct, and specifically Precinct plan 1. That should be the focus of this process.
- (c) There is no need to update the Grimshaw masterplan to incorporate the next level of detail, or to otherwise incorporate additional detail into the provisions.
- (d) Following the plan change process, if approved, the Rōpū will each develop their portion of the land in accordance with the amended precinct provisions and Precinct plans. Each Rōpū will be responsible for their own further detailed master-planning, design, planning and assessment. The assessment criteria set up the framework and level of information that is required to advance development of the precinct.
- (e) There is no need, and in fact it is counter-productive, to include a further masterplan within the precinct provisions themselves, and there is no consistent precedent for this approach in the Auckland Unitary Plan (Operative in Part) (*AUP*). Factors that influence the scale and characteristics of the development inevitably change over time and the timeframe for the development of the precinct as a whole is long. Communities' priorities, preferences and the approaches to the creation of communities evolve over time. Innovations such as the creation of car free living, higher rise living, remote working alongside access to private and public communal open space amenity, and true mixed use communities are evolving; fixed masterplans have the potential to limit innovation and should not be prescribed. The regulatory provisions therefore need to be sufficiently flexible to respond to change.
- (f) The established procedure used in the AUP for this is to set a series of objectives, policies, standards and assessment criteria which means that as individual development of key parts of the precinct proceed, they can be assessed against those provisions. The provisions enable development of the precinct in the knowledge of what the AUP is seeking but retain flexibility so individual developments can be assessed at the appropriate time.
- (g) This is the way the AUP operates across the city and has been applied in the preparation of this plan change. It is unreasonable and unnecessary to expect a further detailed masterplan(s) in contrast to the established approach under the AUP.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

OS1 and OS2

**Specific request OS1**

Please provide an analysis, utilising a methodology appropriate to the scale and density of built environment proposed, of the community infrastructure, including for example publicly accessible open spaces, sports facilities, pools, libraries, halls and educational facilities necessary to provide for the local community that will be enabled by the plan change.

**Reasons for request OS1**

The open space analysis in the application focuses on explaining what *is to be* provided rather than what *is required to be* provided to meet the needs of the community. The community enabled by the changes proposed is a substantial one and, by the very nature of what is proposed, well beyond that envisaged by the current AUP provisions. The demographic nature and scale of that community requires a bespoke analysis of its community open space and community facility needs.

Reliance should not be placed on Council's Parks and Open Space Acquisition Policy 2013 and Open Space Provision Policy 2016. This is a scale and density of development not envisaged by those policies.

Note, however, that reference should be made to the Albert-Eden Sport and Recreation Facility Plan (2021) which provides a picture of the current provision and future demand for sport and active recreation facilities in the Albert-Eden area and identifies need for future facility provision. This report identifies a clear sport field shortfall in the Albert-Eden area. Also, one indoor facility has been closed down at Unitec campus due to the developments on the site.

The analysis requested should be expressed in quantitative and qualitative terms – for instance the amount of land as well as the type of land and how it could / should be developed.

The analysis should also detail where in the precinct needs will arise. For instance, the needs are likely to vary according to where varying densities of development are enabled, and whether the expected demographics within those areas may vary. Note that this geographically-specific analysis also relates to yield and location of yield RFIs under Planning - P1 below.

This analysis will then inform what the plan change should contain as a management framework to ensure the analysis of needs can be met (see OS2). As an example, the analysis may show what the appropriate sizing is of a neighbourhood park, and whether more than one such park should be provided.

The analysis would be assisted, in more “real world” terms by reference to the recent three EPA resource consent applications, what typologies are being proposed there, what provision those applications make for community facilities and what they may rely on being provided in the wider precinct.

**Specific request OS2**

Please provide an analysis of how the community open space and community facility needs identified from RFI request OS1 above will be able to be satisfied under the precinct plan and other provisions proposed in the plan change.

The analysis should relate to the possible needs identified under the RFI in OS1, including in relation to various development types, expected demographics and locations.

**Reasons for request OS2**

It is noted that NPS UD Policy 2.2 requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. Under Policy 3.5 Availability of additional infrastructure local authorities must be satisfied that the additional infrastructure (including public open space) to service the development capacity is likely to be available.

The following provisions under the AUP RPS B2.7 Open space and recreation facilities are also particularly relevant:

**B2.7.1. Objectives**

(1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.

**B2.7.2. Policies**

(1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.

(2) ...

(3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.

(4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.

## Responses to Auckland Council RMA cl 23 Requests | OS1 & OS2 | 3

Part 6.11 of the AEE refers to “The need to reflect the expanded scope of the residential development has prompted a reconfiguration of open space.” Depending on what the analysis sought under OS1 above concludes, a simple reconfiguration of space may be shown as not being sufficient.

If the intention is to provide a mix of public and privately owned and managed community open space and recreational facilities there needs to be an indication of what that mix may be. The public (or wider precinct / community) needs should be committed on the precinct plan, with other needs clearly specified in the provisions.

The application documents refer to private open space, and communal open space, however do not specify standards or any other explanation or provisions as to how this should be provided. For instance, Appendix 3 to Boffa Miskell’s Landscape Assessment refers to Pocket Parks, however also to these being “Voluntarily provided”.

The proposed provisions refer to satisfying open space needs, however it is not certain what the targeted provisions for community open space and recreational facilities should be, including within the different parts of the precinct. As an example, the tower developments in the north-western part of the site are more than 400m from the proposed neighbourhood park. Reliance appears to be placed on the northern park next to the Oakley Hospital but there is a question as to whether that park would or could function as satisfying the needs of the community in that part of the precinct.

### **Applicant response provided by**

John Duthie of Tattico, and Rachel de Lambert and Matt Riley of Boffa Miskell

### **Applicant response**

- 1 This response requests HUD address provision of the following community facilities:
  - (a) open space;
  - (b) sportsfields;
  - (c) parks;
  - (d) libraries;
  - (e) halls; and
  - (f) education.
- 2 It asks for a needs analysis and then a description of how the plan change delivers on those needs.
- 3 This response should be read in the context of the responses under P1 (Enabled Residential Yield) and P9/10 (Spatial Distribution & Vision), regarding what is intended to be achieved by the plan change, as well as responses under OS3 and OS4 which deal with the provision and extent of open space.

- 4 In particular, in terms of yield, the analysis provided when the current provisions of the operative Wairaka Precinct were established identified the potential for 2,500 dwellings plus 1,000 units of student accommodation (with the majority of the student accommodation being single bedroom, but with some family accommodation).
- 5 This plan change provides for a total of 4,000-4,500 dwellings with a range of typologies and dwelling configurations of 1 to 4 bedroom dwellings. The net uplift therefore varies between 500 and 1,000 dwellings depending on the scenario, although there is a significant change assumed in the percentage of student accommodation and hence a reduction in 1 bedroom units.
- 6 This response is provided in terms of each of the requested topics within the clause 23 response, in the context of the 500 – 1,000 additional dwellings discussed above.

**Open space**

- 7 This part of the response should be read in conjunction with responses OS3 and OS4 on open space provision.
- 8 Open space includes land proposed for vesting in the Council for parks as well as land dedicated to stormwater management. Park areas are addressed under the subheading Parks below.
- 9 Precinct plan 1 as proposed through the plan change provides for a total of 10.3ha of land being set aside for open space, stormwater management, and roading. This represents 26.5% of the residential land parts of the precinct (i.e., excluding Unitec and the Mason Clinic). This excludes land required for the finer grained local road network, infrastructure, and any communal publicly accessible and / or private open space.
- 10 Considering open space alone, this proposal provides 5.1ha of open space across the 33.8 ha of the precinct available for development. This includes all Crown land (including Taylors laundry site) not intended to vest as open space, plus the land owned by Whai Rawa. This is all the land available for residential and mixed-use development. It excludes the Mason Clinic and Unitec sites. 4.3ha of the public open space offered for vesting has a primary recreation function and a further ~0.8ha will be vested with a primary stormwater function, whilst also affording open space amenity.
- 11 This is public open space proposed to be vested in the Council and therefore, should that be agreed, will be secured in perpetuity. This represents 15% of the precinct land available for development being set aside as public open space.
- 12 The clause 23 request references the following open space policies:
  - (a) Parks and Open Space Acquisition Policy (2013).
  - (b) Open Space Provision Policy (2016).
  - (c) Albert-Eden Sport and Recreation Facility Plan (2021).



- 13 The request states that reliance should not be placed on the Parks and Open Space Acquisition and Open Space Provision Policies as the scale and density of development is not envisaged by those policies. However, as set out above, the increase in scale of development enabled by the plan change is moderate: in the order of 500 – 1,000 dwellings. On the basis that these are policies are relevant to assessment of how open space is to be provided within the precinct, we have assessed these, and the Albert-Eden Sport and Recreation Facility Plan in turn below.

*Parks and Open Space Acquisition Policy (2013)*

- 14 The policy does not provide specific ratios for open space provision, instead it emphasises the importance of providing high-quality and accessible open spaces that meet the needs of the community. It states that changes to Aucklanders' needs and preferences will influence the location and amount of land that will need to be acquired for parks and open space.
- 15 This plan change has the potential to substantially increase the amount of public open space land within the precinct.
- 16 The current precinct provides for one neighbourhood park of some 3,000-5,000m<sup>2</sup> only.
- 17 The precinct is complemented by the Phyllis Reserve immediately south of the precinct, and the extensive Te Auaunga riparian corridor and associated walkway network. The plan change also does not identify private open space, which will supplement the extensive public open space provision.
- 18 This plan change will provide for 5.1ha of open space of which approximately 4.3ha is proposed to vest in the Council as public open space (subject to the Council accepting this) and a further ~0.8ha will be vested with a primary stormwater function, whilst also affording open space amenity.
- 19 This will substantially increase the amount of public open space within the precinct. This is more than an eight-fold increase in public open space between the existing Wairaka Precinct plan and the proposed Te Auaunga Precinct plan.

*Open Space Provision Policy (2016)*

- 20 The policy does not establish a specific target for the provision of open space in terms of a ratio of open space to population. Instead, it emphasises the importance of defining the purpose of each open space area to comprehensively consider the diverse opportunities and outcomes offered within the open space network. As a result, the provision metrics are determined based on a set of open space typologies that consider the function and/or scale of each specific open space.
- 21 The policy states that the assessment of open space provided in plan changes should address the following factors:<sup>1</sup>
- (a) existing open space network in the area (function of existing reserves, distance to site);
  - (b) overall concept for the open space network;

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<sup>1</sup> Open Space Provision Policy 2016, p39.

- (c) plans identifying the proposed open space network, including typologies, approximate location, size of each open space;
- (d) assessment of the proposed network against the provision measures;
- (e) plans clearly demarcating public open space, esplanade reserve and green infrastructure areas that include the size and dimensions of each space and the extent of flood plains;
- (f) proposed funding and implementation mechanisms;
- (g) timeframes for implementation; and
- (h) demonstration of concepts and feasibility for significant open spaces, or in areas subject to constraints (steep topography, encumbrances, hazards).

22 In this regard:

- (a) Development within the precinct will integrate with Te Auaunga / Oakley Creek public open space network and Te Auaunga network and will integrate with the Phyllis Reserve.
- (b) Precinct plan 1 clearly identifies the location and extent of public open space.
- (c) All open spaces are of a usable size, shape, and contour to meet their functions.
- (d) All open spaces are clear of floodplains, apart from the ponds designed to manage stormwater, which are excluded from the open space area calculation, and the daylighted Wairaka Stream. There is an overland flow path in a small part of one park.
- (e) The open space has good topography and is clear of any physical encumbrances.
- (f) The open space has varied characteristics to provide for a range of different experiences and recreational activities.

23 The policy encourages developers to consider the specific needs of the community when determining the amount and type of open space to provide in the context of residential developments. Provision of a variety of different types of open space including parks, playgrounds, sports fields, and natural areas, is encouraged to ensure that the needs of different user groups are met.

24 This plan change:

- (a) Significantly increases the amount of public open space within the precinct (subject to Council accepting / agreeing the acquisition of such open space). The operative Wairaka Precinct provides one neighbourhood park of 3,000 to 5,000m<sup>2</sup>. This plan change proposes (excluding open space set aside for a stormwater function) 4.3ha of public open space or 8.6 times the amount of public open space provided within operative Precinct plan 1. The operative Precinct plan 1 did provide for private open space. The plan change proposes a more extensive provision of public open space which is well distributed within the precinct.

- (b) Provides for a variety of different open space functions and characteristics to enable a range of recreational experiences and amenity. This is more particularly elaborated on in responses OS3 and OS4 which address the potential function(s) of the different open spaces offered as public open space. The plan change includes areas that can be utilised for active play, or areas to kick a ball around, room for picnic and barbeque areas, ecological areas, walkways and more passive, informal landscape areas with extensive opportunities for seating, walking loops and the use of the open space network to pass through the site through connections with the street network.
- (c) The plan change integrates open space and heritage, including at the Former Oakley Hospital Building, where a complementary open space is provided for in front of the building, setting the building in its northern landscape curtilage, and providing opportunities for the public to appreciate the building from the park. The open space in front of the Former Oakley Hospital Building is immediately adjacent to the three new proposed residential tower sites in Height Area 1. This is an area of flat land, 6,891m<sup>2</sup> in area, and clear of any overland flow path. It provides high amenity open space strongly connected to the precinct's historic identity.
- (d) Similarly, the historic Pumphouse building has open space surrounds, including a reinforcement of its historic connections to water supply, with the daylighted Wairaka Stream and Te Auaunga access park connecting this area to the adjacent open space reserve lands. The Knoll park also provides a setting for Building 48 which remains within the Unitec campus but will retain its long-standing northern outlook to this public open space.
- (e) The open space provision reflects the topography and ecology of the precinct. Again, this is set out in more detail in responses OS3 and OS4.
- (f) This plan change provides for an extensive area of residential development enabling a range of housing typologies, assisting in the establishment of a diverse community. The open space provision provides for a range of different open space experiences to support the community.

*Albert-Eden Sport and Recreation Facility Plan (2021)*

- 25 The plan has a focus on accessibility, inclusivity, and community health and wellbeing.
- 26 The plan focuses on the provision of facilities that support physical activity and healthy lifestyles, and that provide opportunities for people of all ages and abilities to participate in sport and recreation.
- 27 In qualitative terms, the plan emphasises the importance of providing facilities that are accessible, inclusive, and that meet the needs of a diverse community. It also highlights the potential benefits of sport and recreation facilities for community health and wellbeing, and the importance of considering environmental sustainability and resilience in the development of new facilities.
- 28 This plan change:
  - (a) Provides for a variety of open space experiences.
  - (b) Provides open space areas that are geographically spread through the precinct and complemented by the existing Phyllis Reserve on the southern boundary.
  - (c) Provides important connections into Te Auaunga walkway network.

- (d) Provides a broad range of different experiences which will help in fostering inclusivity, community health and wellbeing.
- (e) Enables a range of activities that will provide for a variety of recreational pursuits, other than formal sportsfields.
- (f) Enables a scale of development and nature of open space which responds to the likely make up of the new community. It is not simply one offer but establishes the potential for a variety of recreational opportunities to suit community needs, different types of recreation and different personal preferences.
- (g) Provides open space areas that are accessible to the residents within the precinct and the wider general public, including as they are well connected via walkways to the surrounding residential neighbourhoods.
- (h) Provides direct formal access for the community east of Carrington Road through the precinct to Te Auaunga walkway network via the new consented public road network. These are the roads currently under construction pursuant to the backbone consent. This new road network is shown on Precinct plan 1.

### **Sportsfields**

- 29 The Council's policy and overall sportsfield analysis identifies a shortage of sportsfields within the region generally including the western isthmus.
- 30 The Council's policy notes that as Auckland grows, that demand will increase. A certain percentage of the likely population of the new community will be involved in active sports.
- 31 There have been a number of discussions between HUD and the Council over open space as part of the precinct including whether sportsfields would be provided.
- 32 HUD does not support the provision of sportsfields at this location. The provision of sportsfields need to be resolved in terms of a regional network. To embed sportsfields in this location would have poor planning, urban design and community outcomes. Dedicated sportsfields, for obvious reasons, need to be restricted in terms of casual use by the community so that they are available for organised sports. They are also often access restricted outside these hours, to provide for grounds maintenance or protection.
- 33 A residential neighbourhood needs high use multi-purpose open space land that can be used for a variety of different functions focused on local community need. Regional sportsfields provide a degree of outlook amenity to open space for surrounding residents but they generally serve a wider population. Primarily they meet the sporting needs (depending on code) of a portion of the community. However they do not meet a community's broader multi-functional open space needs which, given the projected size of the future community at this location, means they are particularly challenging to provide. There are also difficulties at this location in terms of providing suitable access and carparking.
- 34 Clearly the Council needs to meet its sportsfields needs in key areas and provide for this regional network. However, HUD remains of the view that open space within Te Auaunga precinct should focus on serving the new community.

### **Parks**

- 35 The existing Wairaka precinct provides for a 3,000-5,000m<sup>2</sup> neighbourhood park to service ~ 2,500+ dwellings envisaged for the Wairaka Precinct.

- 36 This plan change seeks to establish 4.3ha of public parks (subject to the Council agreeing to accept the vesting of this land) plus an additional ~0.8ha of amenity which will vest as a stormwater asset. The location, extent and function of this proposed parkland is set out in responses OS3 and OS4 and is not repeated here.
- 37 The open space represents a ratio of 1ha per 1,000 dwellings.
- 38 The provision of public open space for the intended population is appropriate to service the needs of the new community. The response provided under OS3 and OS4 demonstrates that the range of open space areas is intentionally diverse, i.e. to provide for the differing needs of the community. It has the potential to provide for formal playgrounds, informal play areas, landscaping, picnicking and access to an extensive public walkway network.
- 39 For completeness, it is recorded that the park or recreational facilities associated with the Mason Clinic are all internalised and provided for within that site. Similarly, Unitec provides for their open space and recreational needs of students within their facility, although obviously the students and staff are able to use all the public open space areas within the precinct and wider local area.

### **Libraries**

- 40 The area is serviced by libraries at Mt Albert (St Lukes) and Avondale. The provision of libraries is a Council function. While 4,000-4,500 dwellings within the precinct is a material contribution to assisting and managing Auckland's growth, it is still a relatively small percentage of zoned growth within the Isthmus.
- 41 There is accordingly no proposal to provide additional library facilities within the precinct.
- 42 It is assumed the Council will set its community facilities development contribution policies to address any need for additional library facilities within the western isthmus.

### **Halls**

- 43 The desire of members of the community to use hall facilities will be met in the normal manner through the hiring of available resources, either in the public, educational, or private sector.

### **Education**

- 44 The wider area is serviced by two current primary schools, being Gladstone School on Carrington Road and Waterview School off Great North Road, which has been zoned to include the precinct and can be accessed across the Waterview bridge.
- 45 The Ministry of Education has forecast a future school within the precinct in its National Education Growth Plan 2019, however it has several options to increase its schooling network within this area.
- 46 The Ministry of Education is the appropriate agency to make these decisions. The Ministry does not rely on any Special Purpose: School zoning provisions as would a private school. The proposed zonings do not in any way compromise the Ministry's ability to establish a primary school within the precinct should that be their decision.
- 47 The Ministry has also advised HUD that there is sufficient capacity at Avondale College to meet the secondary education needs of the future community.

**Development of community facilities within the precinct**

- 48 In addition to the specific references above, more broadly, community facilities are enabled within the precinct in accordance with the relevant precinct and underlying zone provisions:
- (a) Informal recreation and organised sport and recreation are permitted activities within the precinct (A15 and A16) and more specifically community facilities, among other things, are permitted within the Historic Heritage Overlay (A3).
  - (b) A range of community activities are permitted in the underlying Business – Mixed Use zone that applies to a large part of the precinct (refer Activity table H13.4.1).

**National Policy Statement on Urban Development and Regional Policy Statement assessment**

- 49 The clause 23 request references relevant policies relating to open space under the National Policy Statement on Urban Development and B2.7 Open space of the Regional Policy Statement.
- 50 With respect to these policies, and as set out above and in the remaining open space clause 23 responses, the plan change provides for a significant level of open space with the potential to have a broad range of functions and enable a range of recreational uses to establish within the precinct.
- 51 The plan change facilitates access to the extensive walkway along the stream margins of Te Auaunga.
- 52 Open space is integrated into the development including management of reverse sensitivity issues.
- 53 Accordingly, HUD considers that the plan change gives effect to the policies referenced.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	OS3
<b>Specific request</b>	Please provide a clear delineation showing which areas of proposed open spaces are required / proposed for stormwater purposes and which areas are proposed for recreation purposes (neighbourhood, suburb and sports park).
<b>Reasons for request</b>	A clear distinction needs to be made in respect of the types of open space to be provided. For instance, drainage reserves should be shown as such on the precinct plan and should take into account existing or potential flood areas (reference the Wairaka Precinct SMP). Note, in that respect, that Figure 8.1 in the Applicant's Wairaka Precinct: Stormwater Management Plan prepared by MPS Ltd (part of the lodgement document bundle) shows a considerable reduction in flooding-affected areas. As part of the response to this RFI confirmation is sought that this accurately reflects the potential for flooding on proposed open space land that is identified as subject to flooding on the council's GIS so that the council can objectively assess its suitability for potential acquisition for open space purposes.
<b>Applicant response provided by</b>	John Duthie of Tattico, Rachel de Lambert of Boffa Miskell and Phil Jaggard of MPS

**Applicant response**

- 1 There are five open space areas identified within the proposed Precinct plan 1. Of these, four have open space, landscape and amenity functions and one has a stormwater function.
- 2 The parks' functions and overland flow characteristics are identified below.  
  
*Northern park*
- 3 This 6,891m<sup>2</sup> open space sits north of the Former Oakley Hospital Building.
- 4 It has an open space amenity and landscape function.
- 5 It is not impacted by overland flow paths.
- 6 It has no stormwater function.

*Central open space*

- 7 The 9,797m<sup>2</sup> Central open space functions as open space.
- 8 It does not have any stormwater function.
- 9 The Council's GIS shows the western area of the precinct is subject to overland flow paths.
- 10 Overland flow paths will be reduced by focusing overland flow into the road corridors approved under the existing backbone consent, but there will remain some but limited impact at the north western part of the precinct, as addressed further in the stormwater impacts section of this response below.

*Te Auaunga access park*

- 11 This is the 3,246m<sup>2</sup> open space that gives access from the central Spine Road to Te Auaunga walkway.
- 12 Its function is open space, riparian planting, access, and amenity.
- 13 It does include the recent daylighting of the Wairaka Stream at the eastern end of this area of open space. Clearly that has a stormwater function in that it is a natural stream carrying both spring water and stormwater. However, this was an underground culvert daylighted for cultural, landscape amenity and ecological reasons. It has been significantly enhanced and provides ecological improvement, amenity and a high-quality landscaping to this area. The entire 3,246m<sup>2</sup> of this open space, which is adjacent to the stream, is considered as having an open space rather than stormwater function.
- 14 An overland flow path is accommodated within the daylighted Wairaka Stream.

*Knoll park*

- 15 This 14,707m<sup>2</sup> area has an open space and landscape function. It lies south of the Pumphouse between Farm Road and the Spine Road. It is close to the Central open space providing good open space linkage.
- 16 The character of this park is varied. At the eastern edge is the Wairaka Stream. This carries spring water and stormwater from the upstream puna (spring) and ponds. It rises to a small ridge before falling to the west. It is heavily treed on the eastern side and atop the knoll. The western side of the park is adjacent to the Spine Road and vacant grassed land with gentle slope.
- 17 The Wairaka Stream is kept in its existing / natural state and is considered to have significant landscape amenity.
- 18 With that exception, there is no other stormwater function in Knoll park.
- 19 There is one minor overland flow path through this open space area in the south eastern corner, refer to the maps provided as set out in the stormwater impacts section of this response below.



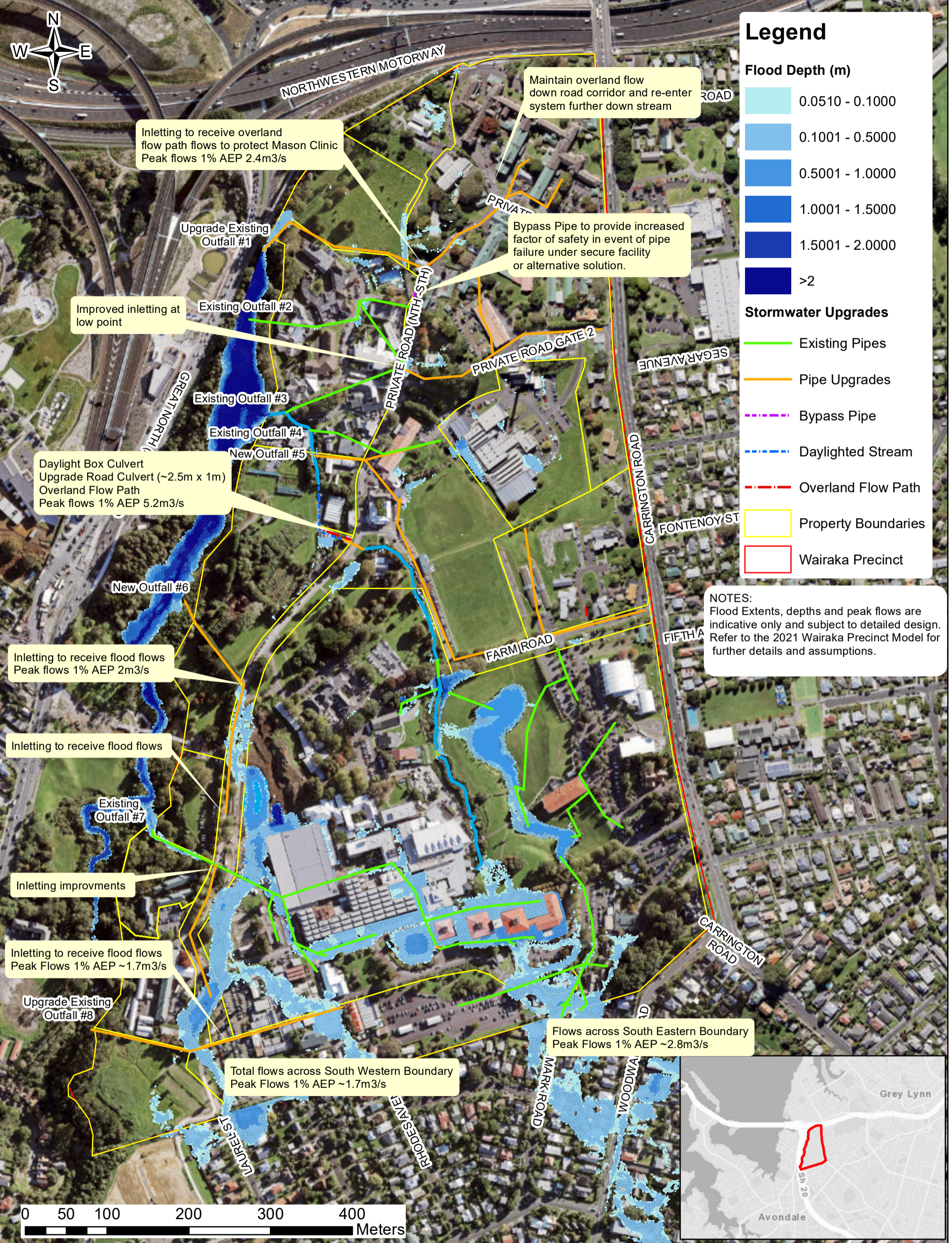
*Southern open space and park*

- 20 This area has a dual function. Approximately one third of the open space encompasses artificial ponds which treat stormwater from the land adjacent to Carrington Road and the upper end of Woodward Road, and housing adjacent which discharges stormwater to the road gutter line.
- 21 While the pond itself is considered to provide a stormwater function, it also creates a good amenity to the area due to the high quality landscaping and open water space of the pond itself.
- 22 On the western and northern side of the pond is a significant grassed area. It has a gentle slope, and provides landscape amenity and opportunities for habitation. It is suitable for passive open space.
- 23 The open space area has no stormwater function. The area that drains the pond and the Wairaka Stream itself are subject to localised overland flow and a flood plain. This area is largely outside of the land owned by the Crown, via HUD, and is associated with the Unitec culvert.

**Stormwater impacts**

- 24 To provide clarity in respect of those areas of the precinct that will be subject to flooding, we have provided two maps from the Wairaka Precinct Stormwater Management Plan (*SMP*) (provided with the application) appended to this response as **Appendix A** and **Appendix B**. The map in Appendix A shows the future predicted flood plain extents once the precinct is fully developed, and the map in Appendix B shows the existing situation. The map in Appendix A does not show all overland flow paths but does show where surface water is expected to exceed 5cm. It also does not include the new swale drain approved under an early works consented located at outfall 6 that will have surface water within the channel during rainfall events. These maps were included in the *SMP* approved by Healthy Waters and the Council. In addition, the model used to predict flooding was reviewed and signed off by Healthy Waters.
- 25 The swale at outfall 6 replaces what was a piped solution and is now constructed in the same location as the earlier proposed pipe solution. Being a daylighted channel it has an increased capacity over a piped solution with flooding being contained within the channel dimensions. With future connections this will have a positive effect on the predicted flood plain extent within the precinct. It remains consistent with the approved *SMP*.
- 26 It should be noted that the flood modelling shown in Appendix A does not represent the final landform which will change as development progresses, and is therefore not known at this time. For example, the flood extents shown around Taylors Laundry and near Building 28 will likely disappear as the land is recontoured and filling of the localised depressions is completed to create the desired landform. It is therefore not appropriate to identify final areas for e.g. drainage reserves on Precinct plan 1 at this stage, with areas to be determined as development progresses through the resource consent process.

- 27 Through redevelopment (as per the approved SMP), overland flow is to be concentrated within existing stream and water course corridors and within road corridors, with key sections of the network providing inlet and conveyance capacity for the 100-year event to completely remove surface flooding. Some sheet flow in parks may occur in extreme events but this is unlikely to be a significant area of concern/risk due to the very shallow depth (<5cm) and this occurs for short periods of time when rainfall exceeds the infiltration capacity of the soils.
- 28 The clause 23 request refers to land that is identified as subject to flooding within the Precinct on the Council's GIS. The Council's flood plains are incorrect in Geomaps as they are based on an old Council model that does not include the existing extensive private stormwater network or the newly constructed swale drain at outfall 6. The Council's GIS therefore incorrectly shows flooding that is worse than the existing situation (refer Appendix B).



**WAIRAKA PRECINCT  
STORMWATER MANAGEMENT PLAN**

DATE: 29 APRIL 2021

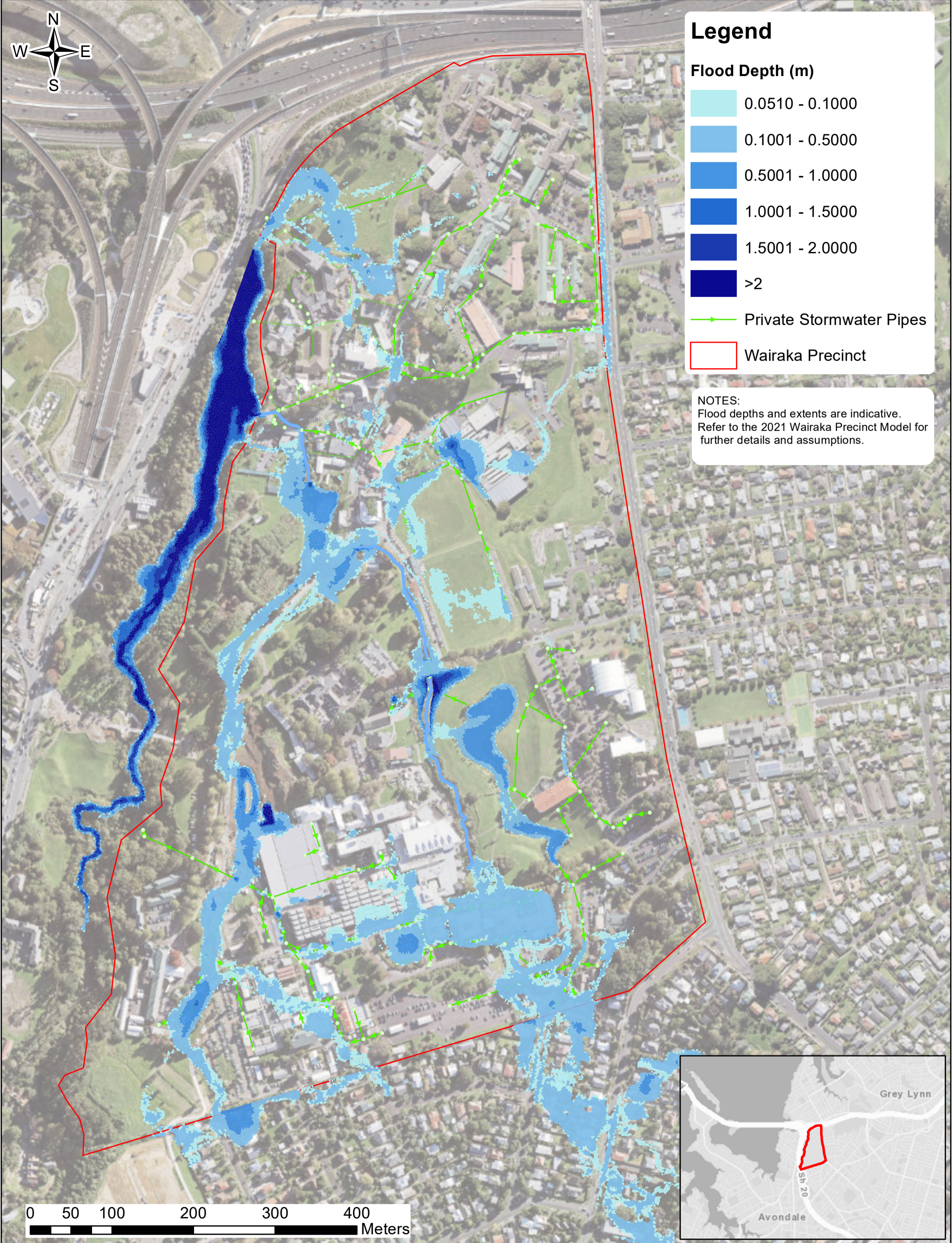
DRAWN: PJ

CHECKED: SM

SCALE (A3) 1:4,000

**PROPOSED UPGRADES TO THE  
STORMWATER NETWORK**

**FIGURE 8.1**



### Legend

**Flood Depth (m)**

- 0.0510 - 0.1000
- 0.1001 - 0.5000
- 0.5001 - 1.0000
- 1.0001 - 1.5000
- 1.5001 - 2.0000
- >2

- Private Stormwater Pipes
- Wairaka Precinct

**NOTES:**  
 Flood depths and extents are indicative.  
 Refer to the 2021 Wairaka Precinct Model for further details and assumptions.

0 50 100 200 300 400 Meters



**WAIRAKA PRECINCT  
 STORMWATER MANAGEMENT PLAN**

DATE: 25 FEBRUARY 2021 DRAWN: PJ

CHECKED: SM

SCALE (A3): 1:4,000

**EXISTING FLOODING  
 CURRENT NETWORK**

**100 YEAR ARI**

**FIGURE 4.2**

While every care is taken by MPS Limited to ensure the accuracy of the digital data, MPS Limited makes no representation or warranties about its accuracy, reliability, completeness, suitability for any particular purpose and disclaims all responsibility and liability (including without limitation, liability in negligence) for any expenses, losses, damages (including indirect or consequential damage) and costs which may be incurred as a result of data being inaccurate in any way for any reason. Electronic files are provided for information only. The data in these files is not controlled or subject to automatic updates for users outside of MPS Limited.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	OS4
<b>Specific request</b>	Please demonstrate how the principles of the council's Open Space Provision Policy will be met with regards to preferred characteristics of neighbourhood parks including road frontage and visibility, flat areas, area for play and landscaping.
<b>Reasons for request</b>	The provided information will contribute into shaping a better understanding of the existing open space network and the necessity for it to expand or transform (change in number, size, and function). This will then enable a determination as to whether the capacity and the quality of the open spaces will be sufficient in the changing character of the area.
<b>Applicant response provided by</b>	John Duthie of Tattico and Rachel de Lambert of Boffa Miskell
<b>Applicant response</b>	
1	The Council has requested an assessment of the open space provision at Te Auaunga against the open space provisions policy including in regard to: <ul style="list-style-type: none"> <li>(a) road frontage;</li> <li>(b) visibility;</li> <li>(c) land contour;</li> <li>(d) suitable play area; and</li> <li>(e) landscaping.</li> </ul>
2	The analysis below analyses the five areas of open space identified in the OS3 clause 23 response against these criteria.
3	The fifth area relates to the open space area currently being used for stormwater management, being the artificial ponds, which has open space adjacent. The ponds themselves have a stormwater management function rather than open space function, albeit they do have landscape amenity benefits. However, for the purposes of this private plan change request, that pond area is outside of open space provision. The open space adjacent, however, does not have a stormwater function. They are outside most flood levels and provide useable open space that contribute to the network and amenity within the precinct.

**Northern park**

- 4 Size and potential functions: This is a 6,891m<sup>2</sup> triangular-shaped site. Potential functions are set out in the OS3 clause 23 response. The regular triangular shape does not compromise the useable open space which is oriented to the frontage of the Former Oakley Hospital Building. The size of the park also creates a significant flat area of public open space. The site is suitable for informal recreation activity and forms a desirable pedestrian entry / exit to the precinct in a location which is well connected to Point Chevalier, as it was historically.
- 5 Contour: This land is essentially flat with a good level contour supporting a range of informal recreational use.
- 6 Road frontage: This triangular-shaped site has full road frontage to Carrington Road. With the Carrington Road widening and other enhancement of this area, the open space is likely to have increased visibility to Carrington Road.
- 7 In addition, the northern boundary of the open space fronts the Northwestern Cycleway which is a highly public through route, and provides many of the same functions of a road in terms of public access and Crime Prevention Through Environmental Design (*CPTED*).
- 8 Visibility: This open space will have high visibility on all frontages. As stated above, the open space has good visibility from Carrington Road and from the Northwestern Cycleway. The Former Oakley Hospital Building faces north onto this open space, and so has the potential to also provide good passive surveillance and overlooking.
- 9 Play area: The OS3 clause 23 response addresses the potential functions of this open space. In summary, it has the potential to provide an informal gathering, seating, picnicking, relaxation space. Part of the enjoyment of the area also includes appreciation of the Former Oakley Hospital Building. It is an important link both visually and physically between the Point Chevalier town centre and the precinct. The opportunity for cafés and community facilities linking back to Point Chevalier as well as to the new urban community within the precinct has also been identified.
- 10 Landscaping: The landscape has been modified from that encompassed in the original layout of the Former Oakley Hospital Building curtilage. Trees and the existing open space layout can be modified and enhanced, while retaining landscape features of value to the amenity of the open space. There is the potential to enhance the axial path oriented to the primary building entry and so enhance the heritage sense of place.
- 11 Shape factor: The shape factor for this open space is triangular. Its shape is determined by existing features being Carrington Road, the North-Western Motorway alignment and the Former Oakley Hospital Building. Essentially the shape is a consequence of actions in the 1960s, being the formation of the North-Western Motorway and the motorway interchange.
- 12 Land contamination: The HUD lands have been subject to a Preliminary Site Investigation (*PSI*) and Detailed Site Investigation (*DSI*) as set out in the P7 clause 23 response. This land has no known contamination.

**Central open space**

- 13 Size and potential functions: This is an approximately 1ha rectangular-shaped area of land with a connection back to the Spine Road. The potential functions are set out in the OS3 clause 23 response. This is a large area of open space suitable for informal active recreation, such as kick-a-ball areas, playgrounds, barbeque areas, seating etc.
- 14 Contour: This land is effectively flat.
- 15 Road frontage: The Central open space has a 39.5m wide access off the primary Spine Road. It also has at least 53m in frontage to Park Road.
- 16 Visibility: This open space area is connected to two street frontages and will likely be surrounded on all four sides by future urban development, predominantly housing. As a large open space area, there will likely be significant buildings facing east and west across the open space. Even those facing south will have views across the park and to the Waitākere Ranges. As development proceeds, these buildings will be able to provide good passive surveillance and therefore good CPTED outcomes.

In the short term, land to the east of the park will be occupied by the Taylors Laundry site. That 2.5ha site has been purchased by the Crown for inclusion in the precinct's development once the lease expires or is relinquished, aligning the provision of this open space with the future residential population.

- 17 Play area: This open space has the most potential for informal active recreation including contemporary play amenities for a range of ages. It is a large flat area of land eminently suitable for informal active recreation activity. As stated in the OS3 clause 23 response, while a portion of this area is subject to an overland flow path this derives from a very small catchment. Furthermore it will be able to be managed through the redevelopment and stormwater upgrade process to place most overland flow on roads or other appropriate management methods.
- 18 Landscaping: A substantial proportion of this area of open space is currently grassed. As with the other areas identified in this response, the land will vest in the Council subject to agreements over Council accepting the vesting and normal land value considerations.
- 19 Shape factor: This is a large, essentially rectangular, centrally located, area of land with a further rectangular connection to the Spine Road.
- 20 Land contamination: The HUD lands have been subject to a PSI and DSI as set out in the P7 clause 23 response. This land has no known contamination.

**Te Auaunga access park**

- 21 Size and potential functions: This 3,246m<sup>2</sup> open space area primarily provides for the daylighting of the Wairaka Stream (partially complete), the native species riparian and amenity planting beside it, and a pedestrian access / walkway connecting the precinct down into Te Auaunga walkway and Creek.
- 22 Contour: The land is mostly flat, although it also includes the formed, naturalised, channel of the daylighted portion of the Wairaka Stream, and the western end of the site slopes down naturally into the Te Auaunga / Oakley Creek valley.

- 23 Road frontage: The eastern end of the open space adjoins the main Spine Road connecting the open space to the pedestrian network within the precinct.
- 24 Visibility: The open space area has frontage to the Spine Road, and faces west to Te Auaunga . High levels of pedestrian through access can be expected consistent with its function, with future residents expected to regularly access the amenity of Te Auaunga and its wider open space connectivity.
- 25 Play area: This site is not intended to function as a formal or informal play area. Rather, that activity can be provided on the closely adjacent Central open space. This open space provides pedestrian connectivity and ecological enhancement of a culturally significant waterway.
- 26 Landscaping: This site has recently been extensively landscaped with planting associated with the daylighting of the Wairaka Stream and walkway already built. The Wairaka Stream riparian margins have been landscaped to a design by Boffa Miskell incorporating ecological / waterway restoration, habitat creation and amenity planting. As this vegetation matures it will provide a high quality public open space environment. Te Auaunga walkway already benefits from mature trees and restoration plantings within the valley. The interconnecting walkway has also been formalised and landscaped as an integral part of open space area under the current early works (Wairaka stream daylighting) consent (BUN 60373075).
- 27 Shape factor: The site has, by virtue of its stream corridor and walkway function, a relatively linear, elongated shape with a lateral connection at the west to connect to the existing Te Auaunga walkway, and a triangular shape at the eastern end to accommodate the daylighted Wairaka Stream.
- 28 Land contamination: The HUD lands have been subject to a PSI and DSI as set out in the clause 23 P7 response. This land has no known contamination.

#### **Knoll park**

- 29 Size and potential functions: This is a 1.57ha area of open space. The potential functions are set out in the OS3 clause 23 response but essentially it is suitable for passive recreation given the mature treed nature of the open space.
- 30 Contour: This area of open space is part of a minor ridge and knoll that runs parallel to the Wairaka Stream. The open space rises up from the Wairaka Stream as it turns towards Te Auaunga / Oakley Creek on both its eastern and northern frontages, culminating in a small well-treed knoll. The landform also drops down to the west incorporating a flat area adjoining the Spine Road.
- 31 Road frontage: This area of open space has an extensive road frontage to the east – Park Road (part of Farm Road), and west – Spine Road giving it good accessibility and presence within the future community.
- 32 Visibility: The land has high visibility from both Park Road and the Spine Road, as well as the Unitec campus. It will also be visible from the Pumphouse which is intended to be adaptively reused. It has good passive surveillance from both established streets and from future areas of urban development. It adjoins the Unitec campus at its high point, where there is a carpark and a historic building used for teaching, and is currently used by the campus for informal recreation, which is expected to continue.



- 33 Play area: This is an area with the potential to provide for walking, sitting, nature observation, picnicking and informal nature play in amongst the large trees and sloping ground. The western end also provides a flat area with the potential for an active playground should the Council determine that in the future, although the topography generally lends itself to more informal arrangements.
- 34 Landscaping: This area has always been identified as having ideal qualities for public open space because of its extensive and mature treed character, the variety of different tree species and associated established amenity. A number of these trees are 'protected trees' as shown on Precinct plan 2 and this area also contains the only notable group of trees in the precinct (ID 173) scheduled under the Auckland Unitary Plan (Operative in Part) and subject to the Notable Tree Overlay provisions. It provides a high quality landscape amenity with immediate effect. Supplementary planting and landscaping, such as the provision of paths, could occur in the future.
- 35 Shape factor: The area has an irregular polygon shape factor reflecting the current vegetation layout and road and land ownership alignments. The topography also affects the perception of the area with the sloping ground adding diversity to shape.
- 36 Land contamination: The HUD lands have been subject to a PSI and DSI as set out in the P7 clause 23 response. This land has no known contamination.

**Southern open space and park**

- 37 Size and potential functions: This is a 1.474ha open space area. About a third of the land is an artificial high amenity stormwater ponds. The rest of the land to the west creates a large open space amenity. The pond has the potential for walkways along its edge to improve its recreational amenity. The potential functions are set out in the OS3 clause 23 response but essentially it is likely most suitable for passive recreation.
- 38 Contour: This area of open space has a gentle to moderate east facing slope. The pond sits in a depression in the landform.
- 39 Road frontage: This open space has frontage to Farm Road on its northern boundary.
- 40 Visibility: The land has high visibility from the Unitec campus and the future development to the east. It is also visible from Farm Road. It has good passive surveillance from future areas of urban development as well as from the campus. It adjoins the Unitec campus and is currently used by the campus for informal recreation, which is expected to continue.
- 41 Play area: This area has the potential for uses such as walking, sitting, nature observation, picnicking and informal play. The pond contributes a high amenity and diversification of the range of open space character within the precinct.
- 42 Landscaping: This area provides a high quality landscape amenity with immediate effect. The pond was established in the 1990s. It is now a mature planted area. The open space is currently grassed, and suitable for informal recreation and increased levels of planting, complimented by the landscape of the pond. It also adjoins the Wairaka Stream corridor on its eastern boundary, which is a culturally significant waterway, surrounded by a range of native plantings.
- 43 Shape factor: The site has an irregular polygon shape factor reflecting the current wetland and surrounding uses.

- 44 Land contamination: The HUD lands have been subject to a PSI and DSI as set out in the P7 clause 23 response. This land has no known contamination.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** OS5

**Specific request** The proposed increase in height of the buildings is beyond the permitted baseline of the AUP. Please provide an assessment of the potential effects of adjoining development (including shading effects) and confirm how the effects on adjacent open spaces could be mitigated.

**Reasons for request** The adverse effect of the infringed height of the building on the open spaces including shadowing and visual dominance should be clarified, and mitigation possibilities outlined.

**Applicant response provided by** Matt Riley, Boffa Miskell

**Applicant response**

- 1 This clause 23 response first describes those parts of the precinct in which increased maximum building height is proposed and the location of open space in relation to those areas. This is followed by an assessment of potential effects on adjacent open spaces, including shading and adverse visual effects.
- 2 In summary:
  - (a) The plan change makes no change to the maximum building heights currently enabled by the operative Wairaka Precinct over the majority of the precinct, with locations in which increased height is proposed being limited to discrete parts of the precinct.
  - (b) Potential adverse effects from additional shading from these increased height areas on adjacent open space are very low to low, due to a combination of factors including distance of the open space from the height area, position of the open space relative to the height area, the extent of shading already enabled by the operative Wairaka Precinct's planned multi-storey built form, and a building setback applying from the adjoining Open Space – Conservation zoned Te Auaunga / Oakley Creek.
  - (c) The proposed additional height will not be visually dominant on adjacent open space due to the above factors, and within the context of the multi-storey buildings currently enabled within the precinct. Proposed matters of discretion for new buildings will further assist in reducing any potential adverse visual effects on the open spaces of the additional height through consideration of the design and appearance of building facades and form.

### Locations of proposed increased maximum building height

- 3 The plan change largely maintains the permitted height enabled by the operative Wairaka Precinct, which over the majority of the precinct is 27m. The plan change proposes to increase maximum building heights above those currently enabled in discrete parts of the precinct. These are shown in **Attachment 1** and described below:
- (a) *Height Area 1*: The maximum building height is proposed to increase in this area to 35m, except that three buildings may exceed this height: one building up to 43.5m, one building up to 54m and one building up to 72m. Height Area 1 (*HA1*) is at the northern end of the precinct.
  - (b) *Height Area 2*: The maximum building height is proposed to increase in this area to 35m. Height Area 2 (*HA2*) is applied in two parts of the precinct:
    - (i) One location is directly to the south of HA1 and extends south over the area currently occupied by Taylors Laundry. For the purposes of this response, this area is called 'HA2 North.' The operative height in HA2 North is 27m.
    - (ii) The other location is directly to the south of the Mason Clinic Plan Change 75 area and adjoins the precinct's western boundary with Te Auaunga / Oakley Creek. For the purposes of this response, this area is called 'HA2 West.' The operative height in HA2 West is 27m in its northern half and 16m in its southern half (zoned Terrace Housing and Apartment Building (*THAB*)).

### Location of open space

- 4 Open spaces adjacent to HA1, HA2 North and HA2 West are described below:
- (a) *Northern park*: This is to the north-east of HA1, separated from it by the Former Oakley Hospital Building.
  - (b) *Central open space*: This is to the south-west of HA2 North, adjacent to the existing Taylors Laundry buildings.
  - (c) *Te Auaunga access park*: This is proposed to provide access between the precinct and Te Auaunga / Oakley Creek. It is at the northern end of HA2 West.
  - (d) *Knoll park*: This is to the east of HA2 West, on land on which there is an existing grove of mature specimen trees. It is separated from HA2 West by part of the required road network.
  - (e) *Te Auaunga*: The creek, which has Open Space – Conservation zoning, borders the precinct to the direct west of HA2 West. Adjoining Te Auaunga / Oakley Creek is an area of Open Space – Informal Recreation zoned land which fronts to Great North Road.
- 5 The location of these open spaces is shown in Attachment 1 to this response.

**Assessment of effects**

*Northern open space*

Shading effects

- 6 Updated shading diagrams provided as part of the response to Council's clause 23 queries model shadow cast by the maximum building envelopes enabled by the operative precinct provisions and also as proposed by the plan change provisions from 9am – 5pm, at two hourly intervals, on the Winter Solstice, Spring Equinox and Summer Solstice. These diagrams show no shadow cast on the Northern park from the proposed three buildings in HA1 above 35m in height. Amenity effects from shadow cast by the proposed additional height in HA1 on the park are therefore nil.

Visual effects

- 7 The view from the Northern park south-west to HA1 would be to a group of taller buildings some 80m from the open space behind the Former Oakley Hospital Building. These would be more visually prominent as seen from the open space than the 27m high buildings currently enabled by the operative Wairaka Precinct in this area. However the modulation of overall massing and scale of the buildings (through stepping of maximum heights: 43.5m, 54m and 72m); the distance they will be viewed from; the foreground view to the Former Oakley Hospital Building; and the extensive matters of discretion proposed that relate to the design and appearance of new buildings (I334.8.1(1A) and (1B)), which will further articulate and add visual detail and interest to the buildings, mean that they will not be visually dominant as seen from the Northern park, nor out of context within the anticipated urban character already enabled in the area.

*Central open space*

Shading effects

- 8 The Central open space is an approximately 1ha / 70m wide area of existing open space. The 'Te Auaunga Precinct Open Space Proposals' document attached to the Assessment of Landscape and Visual Effects report identifies this space as offering the opportunity to provide for informal recreation.
- 9 The operative Wairaka Precinct enables multi-storey buildings (7-8 floors) up to 27m in height to be built adjacent to the Central open space. This currently enabled bulk adjacent the open space is retained by the plan change except for along the north-eastern boundary with the open space where 35m high buildings (10 storeys) in HA2 North are enabled. Along the eastern side of the Central Open Space, the 35m height area is set back from it by up to 50m behind the operative 27m height area.
- 10 The shading diagrams show that within the Central open space area in the proposed precinct and the equivalent area of open space in the operative precinct a similar extent of shadow is cast over the open space by enabled building bulk throughout the year. While there is some additional shadow cast over the open space by plan change proposed bulk on the Summer Solstice, this is limited to early and later in the day.
- 11 Overall, and within the context of the reasonably large size and width of the open space, adverse effects of any additional shading on the Central open space from the height proposed in HA2 North are considered to be very low.

Visual effects

- 12 Noting the highly urban scale buildings (7-8 storeys / 27m) currently enabled by the operative Wairaka Precinct directly adjoining the Central open space, buildings of an additional 2-3 storeys (10 storeys / 35m) will not be a significant change to the viewing environment from within the open space. The general setback of the proposed 35m height area from the open space (i.e. set behind currently enabled 27m height areas) will mean that the additional height will not be overly prominent, with the extensive matters of discretion proposed for new buildings (I334.8.1(1A)) further reducing any scale related effects through Council retaining control on matters including articulation of building form and facades. Overall, this combination of factors means that the additional 2-3 storeys of height proposed within HA2 North as seen from the Central open space would not be visually dominant.

*Te Auaunga access park*

Shading effects

- 13 Multi-storey buildings of up to 27m height are currently enabled along the southern edge of the proposed Te Auaunga access park by the operative Wairaka Precinct. The plan change enables an increase in building height to 35m (an additional 8m / 2-3 storeys in overall building scale) in this area. As shown by the updated shading diagrams, the generally southern placement of potential 35m high buildings relative to the open space results in a Te Auaunga access park being largely in sun throughout the year, with shadow limited to the eastern extent of the open space at 9am on the Winter Solstice. Resulting shading effects on the amenity of the access park are considered to be very low.

Visual effects

- 14 The additional height proposed in HA2 West is not considered to be visually dominant on users of Te Auaunga access park. As noted, the operative Wairaka Precinct enables 7-8 storey (27m) buildings to be constructed directly adjoining the open space. This is already a very urban scale. Furthermore, pedestrians' awareness of an additional 2-3 storeys above this would be limited by the direct proximity of the buildings to the space.

*Knoll park*

Shading effects

- 15 Knoll park is to the east of HA2 West. The plan change proposes to increase maximum building height in HA2 West to 35m from the operative 27m in the northern half of the area. Separated from the height area by the precinct's Spine Road (part of the required road network) and the existing Pumphouse building (a distance of up to 70m), and with reference to the updated shading diagrams, adverse amenity effects on the park from additional shading cast by this extra height are considered to be very low.
- 16 In the southern half of HA2, the plan change proposes to increase maximum building height from the operative 16m to 35m. Separated from this area by the Spine Road, adverse amenity effects on the park from additional shading cast by this extra height are considered to be low.

Visual effects

- 17 The increase in maximum building height in HA2 West to 35m will result in an increase in the visual prominence of built form as experienced by users of Knoll park. Given the intensified urban environment already enabled within the precinct, this increase is considered not to be visually dominant or out of context.

*Te Auaunga Creek – Open Space Conservation zone*

Shading effects

- 18 The three buildings above 35m in height in HA1 will not cast shadow on the Open Space – Conservation zoned land / Te Auaunga / Oakley Creek adjoining the precinct to the west except for at the very northern end of this open space at 9am on the Winter Solstice (refer shadow diagrams in Attachment 2 to the UDA). The effects of this on the open space are assessed at section 5.2.4 / page 30 of the UDA. The assessment notes the shadow moves quickly off the open space and concludes that overall effects on its amenity are very low.
- 19 The updated shadow diagrams show the additional building height proposed in HA2 West do not cast new shadow on the adjacent Open Space – Conservation zoned land / Te Auaunga Creek corridor (nor the Open Space – Informal Recreation zoned area of land along Great North Road which adjoins Te Auaunga / Oakley Creek), except for a very small area of shadow on the Creek at 9am. Given shadow already cast by the Te Auaunga / Oakley Creek’s position in a low lying valley and extensive tree canopy within it, the new shadow – which moves quickly off the area - is unlikely be perceived by users of the open space. Any amenity effects on the open space from this additional shadow are very low.

Visual effects

- 20 The view from people walking along the path network alongside Te Auaunga / Oakley Creek within the Open Space – Conservation zoned land towards HA2 West would be to higher ground largely screened from view by existing trees within the open space. This, and the plan change’s retention of the operative Wairaka Precinct’s required minimum 10m setback of any building from the external precinct boundary with the Open Space Conservation zone, means that there would be likely minimal clear views to the HA2 West additional height such that it would not be visually dominant.

**Matters of discretion**

- 21 Expanding on the discussion above, potential visual effects of the proposed additional height on adjacent open space are also managed by the proposed matters of discretion for new buildings in Te Auaunga Precinct. Council maintains discretion when assessing new buildings on matters of the appearance of new buildings as seen from public open space. These provisions relate to the general articulation of building form and facades and will positively contribute to managing and reducing any potential visual dominance effects on open space resulting from those discrete areas within the precinct within which additional height is proposed.
- 22 Examples of relevant proposed matters of discretion are:

**I334.8.1(1A)**

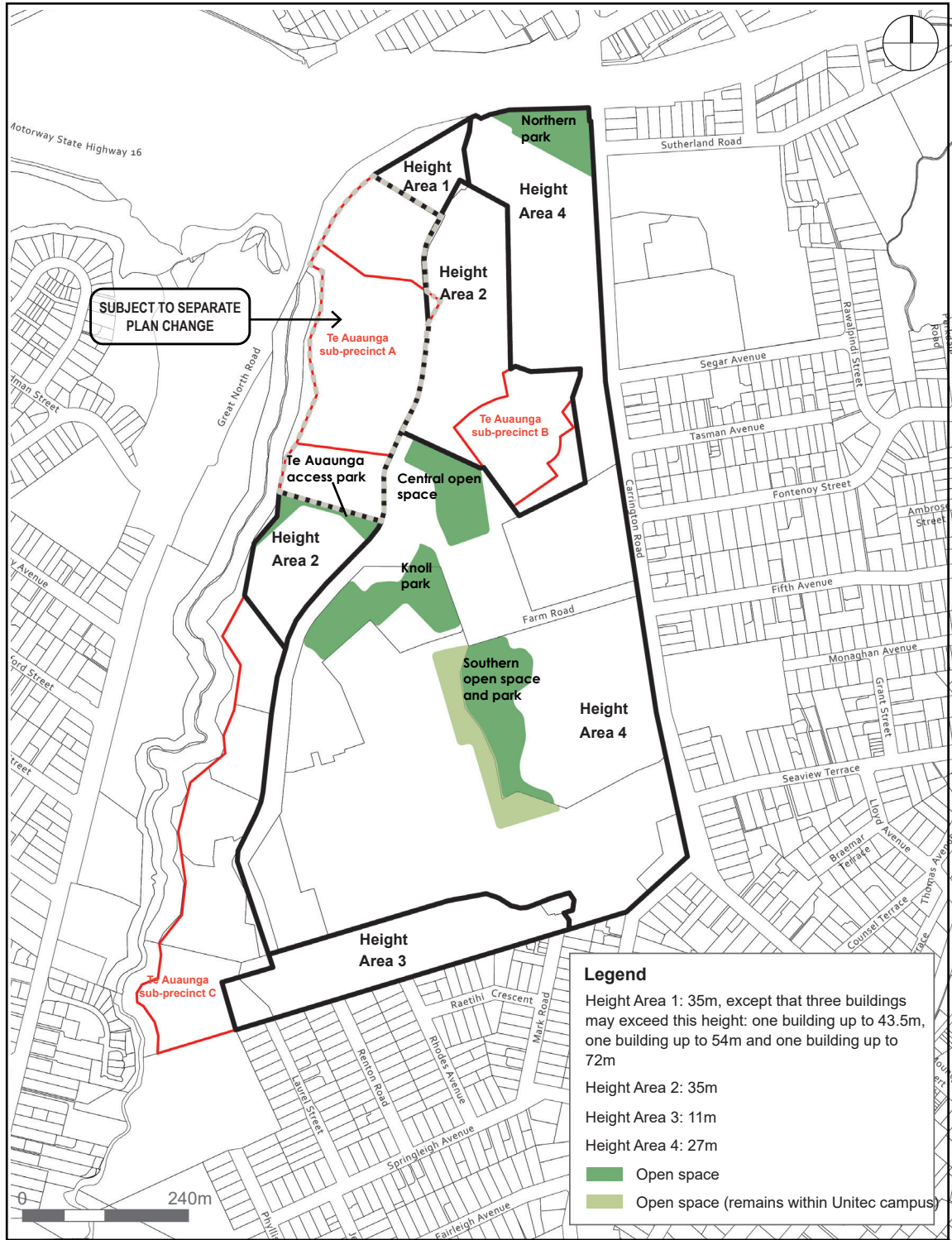
- (b) Building form and character:

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- (i) whether building design and layout achieves:
  - (c) articulation of any building façades which adjoin public roads and identified open space on Precinct plan 1, to manage the extent of large blank and/or flat walls and/or façades;
  - (k) long building frontages are visually broken up by façade design and roofline, recesses, awnings, balconies and other projections, materials and colours;



# Attachment 1: Height Areas relative to Open Space



**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	OS6
<b>Specific request</b>	Please clarify where the relocation of the key open space(private) from Mason Clinic Plan Change area (PC75) has been provided within Te Auaunga PC area.
<b>Reasons for request</b>	<p>During the processing of PC75, the applicant (ADHB) provided Auckland Council with a letter (dated 11 May 2021) of intentions relating to the loss of the identified key open space (private) land as a result of PC 75 (this letter has been provided to the applicant and should be included in the application documentation).</p> <p>A clear indication is sought as to where and how the area and qualities of the area lost (including the amenity and ecological values) are to be replaced, mitigated or compensated.</p>
<b>Applicant response provided by</b>	John Duthie, Tattico

**Applicant response**

- 1 This request seeks information on what Council describes as an “open space relocation agreement”.

**Crown undertaking**

- 2 The Crown (represented by HUD), the then Waitematā District Health Board (now Te Whatu Ora – Health New Zealand), and Council were engaged in negotiations on open space and the portion that was included in the DHB’s expansion land since March 2020. This was some time prior to either Te Whatu Ora’s plan change or this current plan change proposal. In order to resolve the issues raised by the anticipated expansion of the Mason Clinic, the Crown offered the Council an agreement relating to the relocation of open space on to the Crown land.
- 3 Ultimately, Council declined to enter into such an agreement, preferring to deal with open space issues through a different forum (presumably now including this plan change, which was anticipated at the time).
- 4 To provide context for Te Whatu Ora’s own plan change, Plan Change 75 (PC75), HUD wrote to the Council confirming that an equivalent open space provision to that being

## Responses to Auckland Council RMA cl 23 Requests | OS6 | 2

removed from the Te Whatu Ora land would be provided within the HUD land. The statement given was:<sup>1</sup>

As the Crown currently holds 26.5 hectares of land within the Precinct, there is no question that it will be possible to provide equivalent private open space and an equivalent shared path connection on the Housing Development Land.

- 5 The below illustrates how this is achieved, comparing the operative Precinct plan 1 notations to that proposed through this plan change.

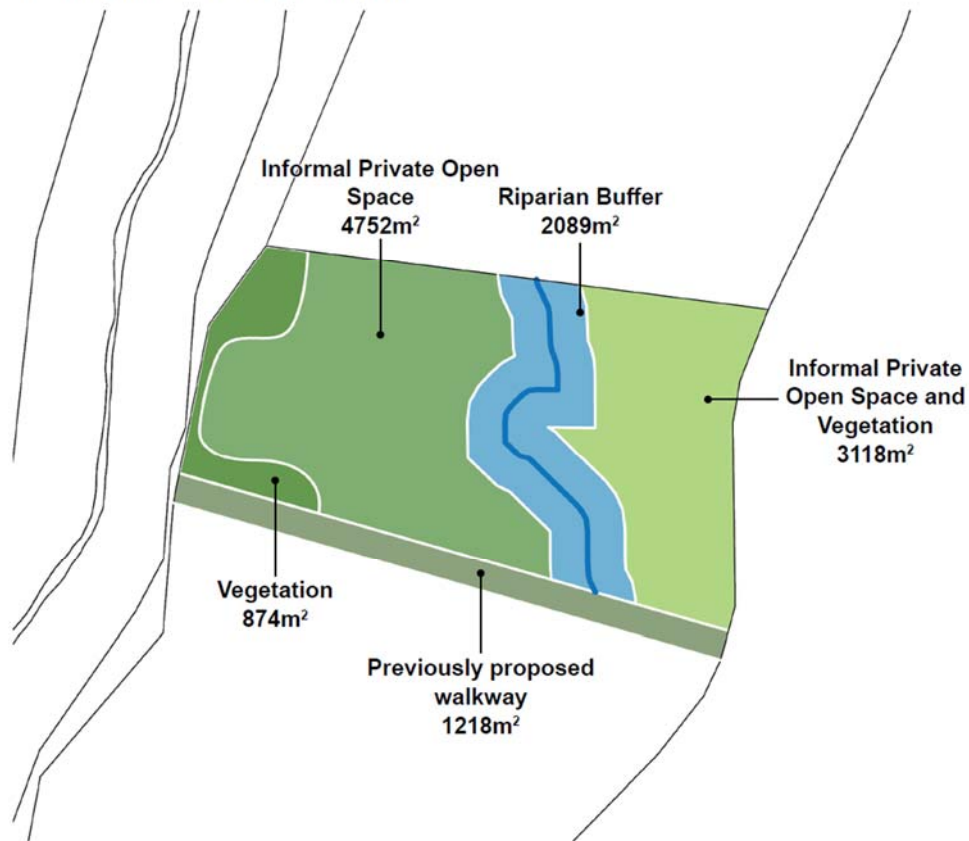
### Operative Precinct plan 1 notations

- 6 The operative Precinct plan 1 provides for a 1.2ha area of "Key open space (private)" on the land adjoining the southern former Mason Clinic boundary. This land was not intended nor identified on the Precinct plan for use as public open space.
- 7 The 1.2ha is shown on the diagram below. It comprises approximately:
- (a) 874m<sup>2</sup> of mature bush along the embankment of Te Auaunga / Oakley Creek;
  - (b) 4,752m<sup>2</sup> of relatively flat grassland used for private passive open space, amenity areas or gardens;
  - (c) 2,089m<sup>2</sup> sitting above the piped drainage channel which was to be daylighted to restore this part of the Wairaka Stream to a daylighted, naturalised condition. (Assessed as a 10m riparian yard either side of the stream);
  - (d) 3,118m<sup>2</sup> being a triangular area between the Wairaka Stream and the new Spine Road. This was suitable for a landscape amenity area; and
  - (e) 1,218m<sup>2</sup> to provide a walkway connection between the Spine Road and Te Auaunga walkway and its associated open space network. (Assumes an 8m wide walkway but excludes the bridge over the Wairaka Stream (counted as riparian).)

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<sup>1</sup> PC 75 – Attachment 14 – Correspondence from HUD, available here: <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc-75-attachment-14-correspondence-from-hud.pdf>.

Mason Clinic - area calculations



**Proposed Precinct plan 1 notations**

8 Proposed Precinct plan 1 provides a 'replacement' open space area of 1.3ha. This comprises approximately:

- (a) 1,070m<sup>2</sup> of vegetation along the embankment of Te Auaunga Stream;

(It should be noted that the precinct provisions under both this plan change and PC75 protect the 10m of bush along the embankment on the Mason Clinic land. Rather than a substitution, this is an additional provision.)

- (b) 9,790m<sup>2</sup> of flat usable open space land, centrally located. This is intended for informal active recreation including kick-a-ball space, playgrounds / mara hūpara, seating, picnic areas and other informal recreation;
- (c) 705m<sup>2</sup> for the daylighting of the Wairaka Stream. This work has been completed within the land administered by HUD. There is an existing resource consent for the Wairaka Stream daylighting within the Te Whatu Ora land (BUN 60386270); and
- (d) 1,480m<sup>2</sup> of walkway connecting to the existing Te Auaunga walkway. This walkway is substantially complete with the pedestrian path formed and planting in place. It is only the last portion connecting to the new Spine Road that is awaiting the construction of the footpath on the Spine Road itself to finalise this public walkway connection.

**Area comparison**

- 9 In terms of a comparison between a before and after situation, the following should be noted:

*Open space relocation*

- (a) The proposal is to vest all land referred to in paragraph 8 above as public open space with the Council. It is a Council decision as to whether or not it accepts this land for vesting. However, in a straight comparison as requested under this clause 23 request, what was identified on the operative Wairaka Precinct plan 1 as private open space is intended through this process to become public open space.
- (b) The comparison, in terms of the gross area, is virtually identical. The new land area is marginally larger but not to any significant degree. The original private open space notated on the operative Precinct plan 1 is 1.2ha. The new public open space comprising the central open space and the walkway connection is 1.3ha.
- (c) The area of land in native bush escarpment under the operative Wairaka Precinct plan 1 is 874m<sup>2</sup>. Under the proposed Precinct plan 1 it is 1,070m<sup>2</sup>. The bush along the Te Auaunga / Oakley Creek is protected on both the HUD land and Mason Clinic land. The proposal is that both areas of bush will be retained, meaning the retained bush area would be approximately 1,940m<sup>2</sup> in total.
- (d) The land area for daylighting of the Wairaka Stream is obviously not a substitution. It will be an addition. The area of the Wairaka Stream administered by HUD has already been daylighted. This work is complete and the landscaping well established. The Council has approved all landscape plans and signed off the final works. This creates 705m<sup>2</sup> of public open space.
- (e) This compares to 2,089m<sup>2</sup> under the operative Precinct plan 1. However, it is understood the intention of Te Whatu Ora will be to continue the daylighting of the remaining piped portion of the Wairaka Stream within their site. The full Wairaka Stream daylighting was anticipated in the relevant resource consent for this work. The likelihood is that this will remain private open space, albeit there will be no public access.
- (f) The comparison of the walkway under the operative Wairaka Precinct was 1,218m<sup>2</sup>. Under this precinct it is 1,480m<sup>2</sup>. The reason for this is to get a better gradient connection to the alignment of the existing Te Auaunga / Oakley Creek walkway

*Total area of open space*

- (g) The total area of private open space identified on the operative Precinct plan 1 is 7,870m<sup>2</sup>. In addition, a 3,000 to 5,000m<sup>2</sup> neighbourhood park adjacent to the western end of the Gate 2 Road is identified on the operative Precinct plan 1 to be provided as public open space.
- 10 By comparison, the total area identified on the proposed Precinct plan 1 to be provided as public open space is 9,790m<sup>2</sup>. This is a 1,920m<sup>2</sup> increase, or more than doubling of the potential public open space area. While the proposed land area to be provided in open space under the plan change is slightly larger (when both public and private areas on the operative Precinct plan 1 are considered), the fundamental difference is a doubling of the public open space providing for more active and passive/ informal recreation, amenity open space, seating area, playgrounds etc.

**Functions comparison**

- 11 As discussed above, the functions of the relevant open space identified on the operative Precinct plan 1 were to preserve the mature bush along the embankment of Te Auaunga / Oakley Creek, provide passive recreation for future residents (held privately), provide an open space area within which the Wairaka Stream would be able to be daylighted, and provide a pedestrian connection between the precinct and Te Auaunga / Oakley Creek.
- 12 These functions are maintained, and enhanced, in the plan change.

**Conclusion**

- 13 The HUD letter referred to in paragraph 4 above set out the Crown's intention to find an equivalency in the lost private open space under the plan change. That consistency has been achieved in terms of:
  - (a) The status of the land: it is proposed that it becomes public open space and not confined to private open space as is the current situation.
  - (b) The land area: the land area has slightly increased from 1.2 to 1.3ha, but to all intents and purposes is the same. Clearly there is no mathematical reduction.
  - (c) The functionality of the land in terms of usable amenity for informal recreation is substantially increased.
  - (d) The same bush protection applies.
  - (e) The same principle of daylighting of the Wairaka Stream and related protections apply.
  - (f) The same pedestrian access to Te Auaunga / Oakley Creek is retained and in fact the access is enhanced, and the gradients more accessible and therefore a better public amenity outcome will be provided.
- 14 In my view this plan change delivers on the statements by HUD that it would achieve a level of equivalence in the substitution for the portion of the lost private open space on the southern expanded Mason Clinic land. This has been achieved on the Crown land both in terms of land area and functionality.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

OS7

**Specific request**

Please provide information as to how the applicant will mitigate for the additional height and population density that will be created as part of the proposed precinct.

Please clarify whether the applicant intends to mitigate for adverse effects created by proposing to vest some or all of the proposed open space at no capital cost or whether it expects financial compensation for some or all of the land.

**Reasons for request**

According to precinct rules ... "financial contributions will be taken in accordance with the precinct rules in order to avoid, remedy or mitigate adverse effects of an activity on the environment. The precinct rules set out the purpose for which land may be required as a financial contribution, and the manner in which the level of contribution (i.e. the amount of land required) is determined".

No information has been provided by the Applicant of its expectations for compensation for the proposed open space areas.

This information is essential to help determine the feasibility of proposed open spaces being acquired by the council (noting that – apart from drainage reserve that vest at no capital cost through the resource consenting process – all open space acquisitions are subject to political approval whether being proposed to vest at no capital cost or purchased).

**Applicant response provided by**

John Duthie, Tattico

**Applicant response**

- 1 The additional information request covers two matters:
  - (a) the open space mitigation strategy relating to height and density; and
  - (b) the expectation around acquisition.

**Mitigation**

- 2 This plan change follows an extensive analysis by the design team, including urban design, landscape and open space specialists, to identify the appropriate size, location, provision and key functions of the open space to be provided within the precinct.

## Responses to Auckland Council RMA cl 23 Requests | OS7 | 2

- 3 The level of open space and its functionality is addressed in OS1 and is not repeated here. In summary:
- (a) The level of open space provision is extensive at approximately 15% of the residential development land area including the Crown land and Whai Rawa land.
  - (b) The proposed open space has the potential to include amenity areas, formal gardens, informal recreation, playgrounds / mara hūpara and space for recreational activity ranging from picnics to informal games / kick-a-ball spaces, nature play, loop walks, seating, nature observation, and public amenities such as cafés, notably within the former Pumphouse.
  - (c) This provides for the open space needs of local residents.
- 4 Furthermore, the open space will provide significant amenity to the adjacent residential areas including outlook space access to green amenity / nature as well as legal access to and from Te Auaunga walkway.
- 5 As in all communities, new residents will also use the open space and community facilities generally within the area including sportsfields, parks, libraries and community halls. Extensive mapping of the walkable catchments of existing facilities was undertaken to inform the proposed provision and layout of the open space provided.
- 6 The precinct adopts the standard private open space requirements for dwellings as set out in the Auckland Unitary Plan (Operative in Part). This plan change does not seek to reduce or alter any of those private open space requirements. The assessment criteria address the needs for private open space.
- 7 In summary, this plan change provides within its boundaries the appropriate level of accessible open space and functionality for a residential community at the enabled heights and population density proposed. The open space analysis has assumed development of the precinct as set out in the assumptions in this clause 23 response (including P1 and OS 1 & 2). This includes the constraints imposed in Height Area 1 by the maximum diagonal dimension of buildings above a 8.5m high podium.
- 8 The additional height and density also mean that additional yield will be enabled by this plan change which will have a corresponding increase in overall development contributions as these are based on a "household unit equivalent". This is relevant to the second component of this request for information, the response to which is set out below.

### Acquisition

- 9 The clause 23 request asks for information on the applicant's "expectations for compensation for the proposed open space areas". In an attempt to be helpful, the below information is provided. However HUD considers there does need to be an agreement with the Council in the form of an Infrastructure Funding Agreement (*IFA*). That is explained below. An IFA would be part of a separate discussion outside this plan change process.
- 10 The planning assessment and section 32 analysis forming part of this plan change application identified HUD's proposal that all of the approximately 5ha of open space provided vest in the Council as public open space. The land to vest as open space and subject to "acquisition" includes:
- The 6,891m<sup>2</sup> *Northern park*



### Responses to Auckland Council RMA cl 23 Requests | OS7 | 3

- The 9,797m<sup>2</sup> *Central open space*
  - The 3,246m<sup>2</sup> *Te Auaunga access park*
  - The 14,707m<sup>2</sup> *Knoll park* south of the Pumphouse and encompassing the knoll between the Wairaka Stream and the Spine Road
- 11 Of this, a portion are the ponds and drainage areas which service both some of Te Auaunga Precinct and some of the Carrington Road/Woodward Road area's dwellings that have stormwater that discharges to the curb. HUD recognises that the pond area will not be subject to compensation. HUD will discuss the open space and walkway area around the pond with Council through the appropriate forum.
- 12 The remaining land areas (set out in paragraph 9 above) are all key open space to provide public amenity, as further described in the OS3 clause 23 response.
- 13 HUD had always understood that the Council will wish to apply its development contribution approach to the vesting of the proposed open space areas, rather than financial contributions, as it does consistently throughout the region. However, HUD has no preference as to which approach is ultimately applied and is committed to working with Council to determine the appropriate method of providing for the identified open space.
- 14 In that respect, HUD considers that the appropriate method to address these matters is through a separate IFA. This is a common technique used by the Council on major developments and would occur outside of the formal plan change process. This approach would accord with the existing separate agreement between the Crown and the Council relating to transport funding arrangements.
- 15 In discussions with the Council, HUD understands there may be a preference for individual agreements on particular assets e.g. a different agreement for roading, parks, and stormwater. HUD is happy to discuss how these might be set up at the appropriate time. It does not consider this plan change is the correct forum to negotiate these matters, as this is a separate process to be worked through with the appropriate Council representatives.
- 16 In summary:
- (a) no compensation is sought for the stormwater assets;
  - (b) all other open space is proposed to vest in the Council as public open space; and
  - (c) an offset in contributions is expected in recognition of that vesting.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

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**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** OS8

**Specific request** It would be helpful to provide an area comparison of the open space (private and public) indicated in the current Wairaka Precinct Plan with the area proposed in the revised precinct plan. Ideally, this comparison would be broken down into drainage, ecological, passive and active open space categories.

**Applicant response provided by** John Duthie, Tattico

**Applicant response**

- 1 This is a non-clause 23 comment.
- 2 The comment effectively requests a table comparing the open space of the operative Wairaka precinct versus this plan change broken down into drainage, ecological, passive and active areas.
- 3 This matter is primarily answered in question OS1. However, for ease of reference, the table is included in this OS8 response.
- 4 The active open space is assumed as flat area suitable for playgrounds and areas of play and activity.
- 5 Passive open space is seen as the more pleasant garden areas, suitable as places to walk and picnic.
- 6 Ecological open space primarily services an ecological function. In the table, the ecological area comprises the southern pond which is approximately 1 hectare of the Southern open space and park. The remaining southern open space has the potential to serve a passive open space function.
- 7 The Knoll park south of the Pumphouse and encompassing the knoll between the Wairaka Stream and the Spine Road open space has been treated as passive open space notwithstanding that it has an ecological function with the mature trees on approximately half of this land, and that it may be possible to incorporate some areas for play into this area.
- 8 The figures below have been rounded down or up to the nearest 0.1ha.

Responses to Auckland Council RMA cl 23 Requests | OS8 | 2

Function	Operative Plan		Proposed Plan Change	
	Public open space	Private open space	Public open space	Private open space
Drainage	Nil	1.8ha	1.0ha	Nil
Ecological	Nil	2.2ha	0.3ha	Nil
Passive	Nil	1.4ha	2.8ha	Nil
Active	0.3-0.5ha	0.4ha	1.0ha	Nil
<b>Total</b>	<b>0.3-0.5ha</b>	<b>5.4ha</b>	<b>5.1ha</b>	<b>Nil</b>

**'Proposed Plan Change xx (Private) – Te Auaunga'  
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<b>Question</b>	L1, L4, L5 and L6
<b>Specific request L1</b>	Please provide an analysis of the existing character and values associated with each viewpoint (including the additional viewpoints as requested below) - taking into account the context afforded by the AUP, PC78 and other statutory instruments - before assessing the effects of the Plan Change on them. This should be a clear two-stage process.
<b>Reasons for request L1</b>	<p>BML's assessment addresses effects on individual receiving environments and audiences via its assessment for individual viewpoints but intermixes its description of the current situation with that anticipated under the Plan Change and related effects. It is very difficult to decipher what the proposed visual changes would mean in terms of effects on both the public and (neighbouring) private domain. Furthermore, Te Tangi a te Manu (para.s 6.12 to 6.16) states that "Landscape Effects are to be assessed against existing landscape values and relevant provisions, exploring existing character and values as precursor to identifying effects - at the relevant spatial scale and in the context of relevant statutory provisions and other matters". It also states (para.s 6.08-6.09) that:</p> <ul style="list-style-type: none"><li>• visual effects are a sub-set of landscape effects,</li><li>• that landscape values take into account physical, associative and perceptual dimensions, and</li><li>• visual values include the interpretation of how views and outlook are understood, interpreted and what is associated with it.</li></ul> <p>It is further stated that (para.6.09) "A pitfall is to superficially treat visual effects as mere visibility or changes to a view rather than the implications for the landscape values experienced in the view."</p> <p>BML's assessment appears to fall into the 'pitfall' just described, with little real analysis of what the changed heights would mean in terms of effects on the characteristics and values of the various urban landscapes found around the Plan Change site. As such, it is important to provide an assessment of those existing characteristics and values – for each viewpoint – before than assessing the effects that the Plan Change would have on them</p>

## Responses to Auckland Council RMA cl 23 Requests | L1, L4, L5 and L6 | 2

**Specific request L4** Please provide additional assessment Viewpoints and related photo simulations and an assessment of effects that address views across Te Auaunga towards the Plan Change site from Great North Road, the Te Auaunga Cycleway / Walkway and the cycleway / bridge over Oakley Creek (see Figures 2 and 3 below).

**Reasons for request L4** Although VS3 and VS4 address views from Great North Road and the cycleway overbridge near the motorway interchange towards the Plan Change site, they both focus, almost exclusively, on development within Height Areas 1 and 2. There is no assessment in respect of views from Great North Road and the Te Auaunga cycleway / walkway to the east – towards development within Height Areas 2 and 4 beyond Oakley Creek.

The fuller range of landscape and visual effects potentially visited on Te Auaunga and the Oakley Creek Reserve still need to be addressed – relative to those using the cycleway / walkway and Great North Road, as well as the large catchment of Waterview residents who live near these thoroughfares and open space.

**Specific request L5** Please provide a new visual simulation that captures views from the Pt Chevalier Town Centre towards Oakley Hospital and Building Height Areas 1 and 2 (see *Figures 4 and 5 below*).

Please also provide an assessment of effects that addresses the interaction between the Town Centre and Plan Change development via a viewpoint as described above.

NB: The response to this RFI may be combined with the RFI in H1.

**Reasons for request L5** The photos and simulations provided for Viewpoints 5 and 6 are not from the core town centre area and don't capture the interrelationship of potential future development with that which exists within the Town Centre. Furthermore, the images prepared for Viewpoint 6 are truncated, both vertically and horizontally. A revised Viewpoint 6 – located within the Town Centre – would more appropriately capture the interplay of Pt Chevalier's centre with the development proposed in Height Areas 1 and 2), as well as the interaction between that development and the historic Oakley Hospital Building.

The fuller range of landscape and visual effects associated with the interaction between Pt Chevalier's Town Centre and development within the Plan Change site still need to be assessed. This could be achieved via relocation of BML's Viewpoint 6, as described above.

**Specific request L6** Please provide an assessment of the effects associated with overlooking on the Mason Clinic.

**Reasons for request L6** It is stated at p.14 that “*The taller buildings in this location (Height Area 1) will look out and well over the top of the Mason Clinic ...*” and refers to “*the avoidance of dominance and / or amenity effects particularly on direct neighbours*”. Height Areas 1 and 2 are located directly adjacent to the Mason Clinic and its internal courtyards, it is unclear if the taller development within those areas (especially Height Area 1) could / would impact on the Mason Clinic and its occupants – including on their privacy.

**Applicant response provided by** Rachel de Lambert of Boffa Miskell

**Applicant response**

- 1 Responses to these clause 23 requests are contained in the updated Assessment of Landscape and Visual Effects dated 3 July 2023 provided with this clause 23 response package.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

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**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

- Question** L2 & L3
- Specific request L2** Please provide an additional assessment Viewpoint and related photo simulations that address views across the Plan Change site from closer to Woodward Road (see Figure 1 below).
- Reasons for request L2** Figure 1 and VS1-7 address only the lower end of Carrington Rd, not development to increased heights down most of its length. Although VS7 addresses the relationship of MHU development to Height Area 4 (in particular) the relationship of that same Height Area to the (proposed) THAB Zone further south along Carrington Rd is still relevant to the assessment of effects.
- The elevated and 'introductory' nature of views across the site from near Woodward Road mean that this part of Carrington Rd is particularly important in terms of public interaction with future development across it.



Figure 1. Carrington Rd Near Woodward Avenue

- Specific request L3** Please provide an assessment of effects which addresses this additional viewpoint(s): on Carrington Road.
- Reasons for request L3** The fuller range of landscape and visual effects experienced by those living on Carrington Road and travelling down it still need to be assessed – as described above.
- Applicant response provided by** Rachel de Lambert Boffa Miskell

### Applicant response

- 1 An additional visual simulation has been prepared from the Figure 1 (above) viewpoint as requested. Refer VS11A / VS11B in the Boffa Miskell Landscape and Visual Effects Graphic Supplement. Commentary in respect of the fuller range of potential landscape and visual effects experienced by those living on Carrington Road and travelling down it is set out below.
- 2 Carrington Road forms a long, straight eastern boundary to the precinct between Great North Road, in the Point Chevalier town centre, in the north, to the Woodward Road 'T' intersection in the south. Just south of Woodward Road, Carrington Road kinks southeast as it heads toward the Mount Albert town centre. The road is more elevated in the south grading down along Carrington Road from approximately RL50 in the south to RL20 at the North-Western Motorway overbridge. Views north along the Carrington Road corridor from close to Woodward Road / Seaview Terrace are therefore more elevated, at approximately RL50, and have an outlook that is terminated by views to the Upper Waitemata Harbour and North Shore beyond.
- 3 This part of Carrington Road has a character comprising more traditional suburban housing along the eastern side of the road corridor, also including Gladstone School, and the more open, spacious former Unitec campus landscape to the west. The campus frontage has until recently been defined by an almost continuous low (between Gates 4 and 2), mixed species ornamental hedge with a roadside grass berm. A narrow width footpath is located behind the hedge. Street trees located in the western berm are intermittent and of poor quality / limited impact within the street. Carrington Road currently has single lanes in either direction with a wide painted median to facilitate turning. The introduction of State Highway 20 Waterview led to a substantial reduction of non-destination through traffic on Carrington Road. Auckland Transport's (AT) proposed widening of Carrington Road will alter the scale of the road carriageway and, with the full 8m width taken from the west side of the road, result in the removal of the existing road frontage, and street tree, vegetation. The proposed road reserve will however include a full width continuous pedestrian footpath along the west side of the road and associated street trees.
- 4 More recently some suburban residential sites on the east side of Carrington Road, such as at the Tasman Ave intersection, have undergone re-development comprising more intensive, three storey attached multi-unit housing. Such re-development signals the anticipated urban intensification enabled by the Auckland Unitary Plan (Operative in Part) (AUP) and further encouraged through the application of the Medium Density Residential Standards (MDRS), implementing the National Policy Statement on Urban Development 2020 (NPS-UD). For parts of Carrington Road in the walkable catchment of the Baldwin Ave train station, up to six storey urban redevelopment is proposed to be enabled through Plan Change 78 (PC78).
- 5 In March 2023, via the COVID-19 Recovery (Fast-track Consenting) Act 2020, two resource consent applications for multiple buildings made by Marutūāhu-Ockham Group were granted. Resource Consent 1 (RC1) represents approximately one hectare of development. Resource Consent 2 (RC2), comprises four new buildings on a land area of 6,477m<sup>2</sup>. The sites for the consented RC1 and RC2 developments are illustrated below.



- 6 RC1 comprises two abutting mixed-use buildings containing 381 residential apartments, 11 retail premises, three office premises, a 'metro-sized' supermarket and associated access, landscaping and parking facilities on 11,330m<sup>2</sup> of land at 1, 1A and 99 Carrington Road. The two buildings in RC1 fronting Carrington Road are six storeys with a partial, setback, seventh storey (each comprising six apartments, two 3 bed, two 2 bed and two 1 bed). Set behind there are two taller nine storey buildings with the ninth floor also having a smaller footprint to that of the eight storey component below. Setting aside taller elements associated with roof profile variation, the six storey buildings fronting Carrington Road are 19.6m in height (approximately 22.8m to the indented seventh floor) taller nine and ten storey buildings behind are approximately 27.4 (with taller roofline variation elements) and approximately 30.1m in height.



Figure 2: Consented Marutūāhu-Ockham Group RC1 and RC2 development sites fronting Carrington Road within the 10ha 'Project Maungārongo' development area.

- 7 RC2 comprises four abutting mixed-use buildings containing 266 residential apartments, and 6 retail premises, and associated access, and landscaping on 6,477m<sup>2</sup> of land at 1 Carrington Road. These four buildings occupy the Carrington Road street frontage between Gates 1 and 2. The northern building, Building 3 in the north is seven storeys (22.2m), the central Buildings 4 and 5 are ten (31.5m) and nine storeys (28.4m) respectively and the southern Building 6 is eight storeys (25.1m) on its Carrington Road / Gate 2 intersection corner.
- 8 These consented developments form part of the existing environment of Carrington Road, they signal development anticipated as a result of the Wairaka Precinct provisions as well as the anticipated greater height of development sought through the plan change and the direction of Government initiatives in respect of the NPS-UD/MDRS.

**Viewpoint 11 (VS11)** (prepared in response to clause 23 request)

*Existing View*

- 9 This viewpoint is looking north along Carrington Road at the Seaview Terrace intersection from a viewpoint on the east side footpath. It is similar to that of VP10, and like VP8 & 9 it was requested by Council during the pre-lodgement process.
- 10 This part of the former Unitec Campus is more vegetated but also affords some longer distance views to the west with a backdrop of the Waitākere Ranges. 27m height development enabled within the Unitec campus under the operative Wairaka precinct provisions would, however, block these longer distance views. The long linear corridor of Carrington Road forms the frontage of the Precinct with more traditional suburban housing, zoned MH-U on the east side of the road. Gladstone Primary School sits in the middle of the block between Seaview Terrace and Fifth Avenue to the north.
- 11 An approximately 8m width of road widening is proposed along Carrington Road with the widening taken from along the precinct's eastern boundary. The widening provides for enhanced cycle, pedestrian, and public transport corridors along the key arterial. The Crown has funded Auckland Transport to upgrade Carrington Road through the Infrastructure Acceleration Fund, including for dedicated bus and cycle lanes, with works programmed to start in 2025. These works have not been modelled in the visual simulations but the additional 8m road corridor width is shown along with the correct positioning of the potential future built edge to the Precinct.
- 12 PC78 proposes the re-zoning of existing MH-U land on the east side of Carrington Road in this location to Terrace Housing and Apartment Buildings (*THAB*), with a six storey height overlay, due to its position within the walkable catchment of the Baldwin Ave train station. The southeastern corner of the site touches the defined walkable extent of the Baldwin Avenue and Mt Albert train stations. Figures 3 and 4 below illustrate the proposed PC78 re-zoning for land along Carrington Road adjacent to the precinct.

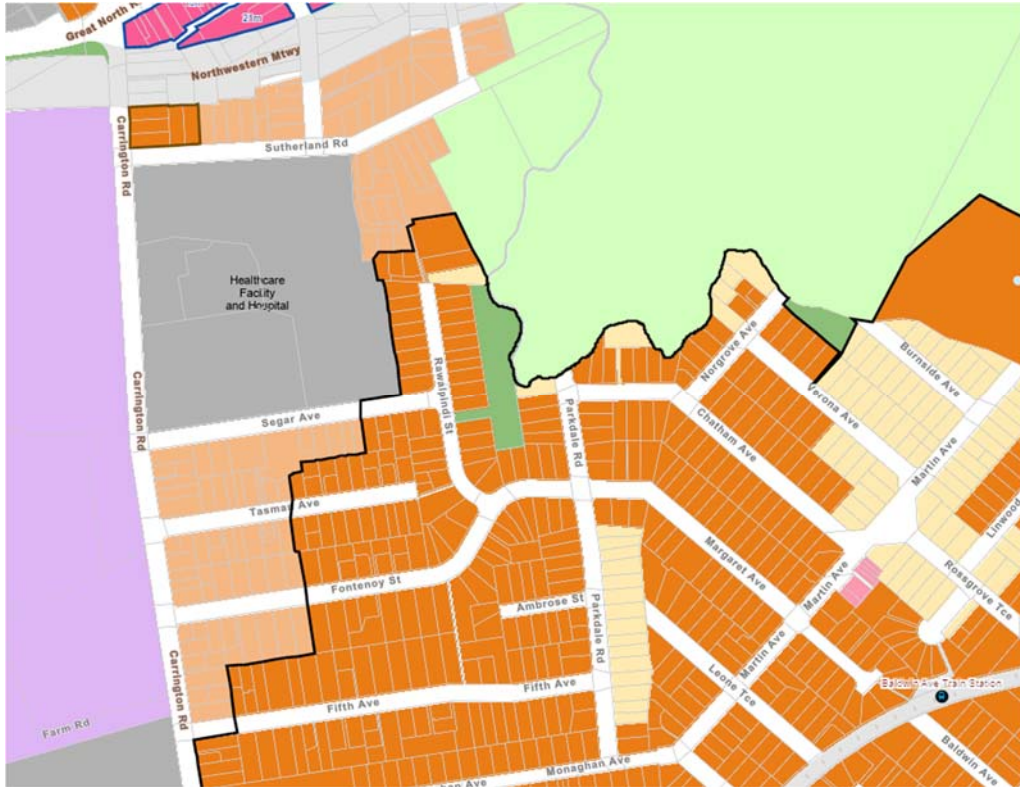


Figure 3: PC78 proposed zoning to the east of Carrington Road opposite the site showing the extent of THAB, MH-U and Special Purpose Healthcare Facility and Hospital zones.

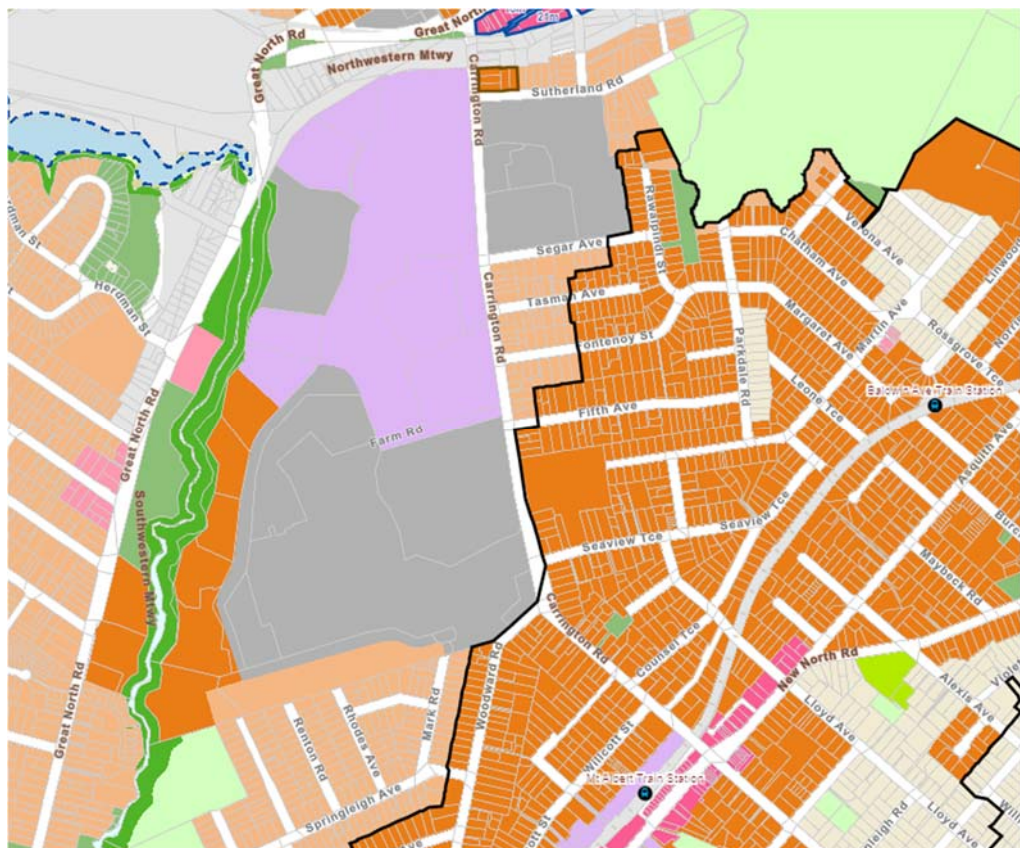


Figure 4: Zoomed out figure of PC78 proposed zoning showing full walkable catchment in vicinity of precinct.

- 13 As can be seen in the VS 11B visual simulation future multi storey built development at enabled 18 and 27m heights anticipated by the operative provisions of the Wairaka Precinct of the AUP. This enabled development will transform the well vegetated, parkland, broadacre campus nature of the site to one with a predominant built, urban residential / mixed use built character. Enabled development within the Unitec Campus, which forms part of the frontage to this part of Carrington Road, has a 27m height within the Business Mixed Use (B-MU) zone. This enabled development under the operative Wairaka Precinct provisions will enclose the street edge and foreclose existing longer views across the campus to the Waitākere Ranges in the west.

*Proposed View*

- 14 In the proposed view (VS 11A&B) some existing established vegetation along the frontage of the precinct to Carrington Road has been retained with the proposed enabled 27m height development lining the west side street corridor.
- 15 Given the scale of the widened Carrington Road transport corridor and its enhancement, including street tree planting, and the context of existing MH-U and PC78 THAB enabled development, the proposed 27m height enabled fronting Carrington Road is assessed to generate **low** adverse visual effects. Urban scaled apartment development is already anticipated along this public transport bus arterial road corridor which enjoys proximity to both the Mt Albert and Baldwin Ave train stations and the dual town centres of Mount Albert (south) and Point Chevalier (north). The arterial corridor has the capacity to accommodate urban scaled mixed use development change with relatively low adverse visual effects.

*Summary Carrington Road Landscape and Visual Effects*

- 16 The Wairaka Precinct provisions currently envisage the transformation of the former Unitec Campus site from its present, largely open, spacious, low-density campus state to one exhibiting substantially higher density apartment style development comprising buildings 18m in height stepping to 27m at a distance of 20m from the current road boundary.
- 17 In a similar vein, the AUP and PC78 envisage urban brownfield re-development along much of the eastern side of Carrington Road, at 27m in the north within the area zoned Special Purpose Healthcare Facility and Hospital and 21m in the south, within the walkable catchments of the Baldwin Ave and Mt Albert train stations. A portion of Carrington Road between Fifth and Segar Aves is proposed to be zoned MH-U in PC78 (although subject to submissions seeking THAB, like the land to the south). The change to this anticipated future urban condition requested through the Te Auaunga Precinct PPC is to enable buildings at 27m height fronting Carrington Road. Consented development in the two Marutūāhu – Ockham proposals comprise mixed use, predominantly residential apartment buildings of between six / seven storeys (19.6m in height at six storeys and approx 22.8m to the indented seventh floor) in RC1 and up to ten storeys (31.5m) in RC2 which comprises four buildings fronting Carrington Road ranging in height from six to ten storeys.
- 18 In the context of the already enabled and consented development of the precinct the changes to the Carrington Road frontage building heights sought through the PPC are considered to be consistent with the anticipated urban landscape of this arterial road corridor. Adverse visual effects are assessed to be **low** in respect of residents of properties to the east and for users of the road corridor, noting that substantial change can be anticipated on both sides of Carrington Road over coming years.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L7
<b>Specific request</b>	<p>Please provide an analysis of those factors, within Height Area 1 (in particular, that that would render development at the additional height sought being either appropriate or conceivably inappropriate in landscape terms – in terms of:</p> <ul style="list-style-type: none"> <li>• its location,</li> <li>• surrounding landforms, vegetation patterns and development,</li> <li>• surrounding zoning and</li> <li>• the relationship with the Oakley Hospital Building?</li> </ul>
<b>Reasons for request</b>	<p>At p.15 of BML's assessment, it is stated that "there is nothing inherently inappropriate, in urban landscape terms, about the additional height sought above that already enabled ..." – focusing on Height Area 1.</p> <p>However this begs the questions, are there any factors that make it inherently appropriate from a landscape standpoint? Without such evaluation, there is a possible implication that the higher development within Height Area 1 (in particular) has been 'pre-judged' to some degree.</p>
<b>Applicant response provided by</b>	Rachel de Lambert, Boffa Miskell
<b>Applicant response</b>	<p>1 The approach to determining what enabled building height within the precinct would be appropriate has involved a comprehensive assessment, including in particular with respect to relevant landscape matters. This includes the stepping down of height relative to the more sensitive adjoining southern suburban residential boundary of the precinct, and the identification of locations where, in the context of the land's topography, relationship with other landscape features; the pattern of adjacent streets; and the location of other residential neighbours, greater height, above the enabled 27m of the Business – Mixed Use zone, could be accommodated in a way that:</p> <ul style="list-style-type: none"> <li>(a) enables the utilisation of the precinct for its housing purpose; and</li> <li>(b) supports the identity and character of the precinct without generating inappropriate adverse landscape or visual effects.</li> </ul>

- 2 In considering the opportunity to accommodate additional height, the options of enabling some buildings that would act as landmark, taller, features in the landscape as well as places where a lesser number of additional storeys could be accommodated were considered.

**Height Area 1 – Location**

- 3 Height Area 1 is located in the north-western corner of the precinct.
- 4 In landscape terms, Height Area 1 is located within the northern geographic highpoint of the precinct (approximately RL25m).
- 5 Height Area 1 has interfaces to the north and west to immediately adjoining scheduled protected and unprotected mature trees which fringe the adjoining road / motorway network as an extension of vegetation along Te Auaunga / Oakley Creek. To the east, Height Area 1 sits adjacent to the Former Oakley Hospital Building and the northern extent of the Spine Road, which provides frontage to the Area. To the south, the boundary is to the Mason Clinic which sits at a lower elevation (approximately RL10).
- 6 This location within the precinct was selected due to the ability for a cluster of taller tower buildings to act as a legible marker to the urban regeneration area and future community, in a location that is well separated from adjoining suburban residential neighbours, relates to the substantial open space context of Te Auaunga and the large scale infrastructure environment created by the North-Western Motorway and Waterview Interchange. It maintains the historical presence of prominent buildings at the precinct's interface to Point Chevalier. These landscape factors contribute to the successful accommodation of additional height in this part of the precinct.

**Surrounding landforms, vegetation patterns, development and zoning**

- 7 The North-Western Motorway is one of the key approaches to / from the Central City. The open space landscape context provided by the treed northern and north-western frontage of Height Area 1 to the adjacent large scale infrastructure of the North-Western Motorway and Waterview Interchange and the way in which this forms one experience of arrival to the Central City, creates what is considered to be an appropriate setting for buildings of increased height that can form a marker to the precinct as one of the City's urban regeneration areas and a signal to the community created within the precinct.
- 8 Landmark tall tower buildings of this nature have similarly been incorporated within other areas of urban renewal in Auckland, such as at Hobsonville and Smales Farm.
- 9 In respect of the relationship of Height Area 1 to the North-Western Motorway the most public aspect of the proposed taller buildings will be in respect of views along this motorway corridor. In such locations the taller cluster of towers would frequently be seen in the context of a receiving environment containing large scale and elevated elements of roading infrastructure including grade separated overpasses. In this urban context the presence of taller residential tower buildings would relate to the scale of the adjacent infrastructure and be less incongruous than if seen in a purely suburban residential context.
- 10 The Upper Waitematā Harbour lies to the west adjoining the margins of both the Waterview and Point Chevalier suburbs. In addition to creating an open space landscape context which assists in accommodating buildings of greater height within the urban landscape this context creates desirable amenity for future residents. The precinct's natural elevation, and western Harbour aspect lend it natural attributes that create amenity for higher intensity, apartment living. Higher rise buildings in this location also have the benefit of wider landscape connections to the Waitākere Ranges and Central City skyline.

- 11 Te Auaunga / Oakley Creek forms a large scale natural landscape element adjoining the precinct to the west. The creek flows into the tidal reaches of the Waitematā Harbour to the immediate west and is deeply incised through the well vegetated open space corridor defined to the west by Great North Road and precinct to the east. Vegetation has both mature exotic species characteristics associated with early European habitation and milling activities using the resources of the waterway and an increasing return to a forested indigenous species corridor. This western border of significantly scaled, vegetated open space provides a landscape counterbalance to the increased residential density and built scale of development within the precinct. It assists in mitigating the potential adverse effects of additional height both in respect of screening views from within the adjoining open space and providing a well scaled frame of vegetation at the western base of the enabled cluster of tower buildings.
- 12 In landscape terms adjacent established suburban residential neighbourhoods are well separated from Height Area 1 with the closest houses on Montrose Street in suburban Point Chevalier to the north (currently zoned Residential – Terrace House and Apartment Buildings) being some 200m away across six lanes of the North-Western Motorway and houses in Waterview on Waterbank Crescent (currently zoned Residential – Mixed Housing – Urban) some 450m away and also separated by significant roading infrastructure including Great North Road and the four Waterview Tunnel egress lanes. Suburban residential properties across Carrington Road in Mount Albert (currently zoned Residential – Mixed Housing – Urban) are some 400m distant, at their closest point at the corner of Segar Ave. This separation supports the appropriateness of additional height in this part of the precinct as potential adverse effects associated with the interface to established suburban neighbourhoods can be avoided.

**Relationship with the former Oakey Hospital main building**

- 13 The Former Oakley Hospital Building was built with an axial relationship to a cross roads intersection at the western end of the Point Chevalier town centre. The building's historical relationship and physical connection to Point Chevalier was severed by the insertion of the North-Western Motorway. Nevertheless, the building retains its primary frontage toward Point Chevalier with an associated parkland open space curtilage to the northeast. Height Area 1 is positioned behind the 'line' of the Former Oakley Hospital Building frontage to the west with an association more to the rear of the building with its series of later constructed wings and courtyards. This positioning of the enabled taller residential towers leaves the Former Oakley Hospital Building to retain its presence addressing Point Chevalier with its significant heritage façade sitting forward of the towers with the northern curtilage protected as public open space. The proposed towers do not detract from this primary heritage relationship.
- 14 In the same way the Former Oakley Hospital Building in its time presented a landmark scale and form of prominent development in the context of the pattern of urban form at the time.

**Height Area 2**

- 15 In respect of Height Area 2, where 35m as opposed to the current 27m height control is sought, it is the nature of the precinct's topography that has guided the positioning of the Area. The natural topography falls away from the higher ridgeline along Carrington Road to Te Auaunga. As such, presently enabled 18m stepping to 27m or 27m height enabled buildings, as sought through the plan change, along the development area adjacent to Carrington Road will obscure the presence of taller, up to 35m, buildings embedded into the precinct from the adjacent residential neighbourhood.

- 16 The relationship between potential development in Height Areas 1 and 2 and the Former Oakley Hospital Building is further addressed in the Assessment of Effects on Historic Heritage prepared by Archifact and attached to this clause 23 response package.



**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L8
<b>Specific request</b>	Please provide details about the RDA Assessment Criteria referred to in p.4 of the RDA Architects' assessment: <i>"Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in section I334.8 Assessment – Restricted Discretionary Activities."</i>
<b>Reasons for request</b>	<p>DPA Architects' heritage assessment appears to rely on these criteria to ensure a degree of compatibility between the Oakley Hospital Building and future development within Height Area 1 (especially). However, at present those Assessment Criteria only go so far as to include:</p> <p style="padding-left: 40px;"><i>(k) the effects of the design, appearance and impact of all buildings and structures including elements of height, architectural treatment of building façade and overall scale on the amenity values of the natural and physical landscape;</i></p> <p style="padding-left: 40px;"><i>(l) long building frontages are visually broken up by façade design and roofline, recesses, awnings, balconies and other projections, materials and colours;</i></p> <p>Neither these, nor any other, criteria within section I334.8 appear to address the relationship between development within Height Area 1 and the Oakley Hospital Building. Although proposed Policy 1334.3(4)(i) also requires "the identification and protection of significant landscape features, the adaptation of the scheduled historic buildings, identified trees and integrated open space network", this also fails to address the relationship between heritage buildings and new development.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell; John Duthie, Tattico
<b>Applicant response</b>	<p>1 A new policy I334.3(14AA) is proposed as follows:</p> <p style="padding-left: 40px;">Require proposals for new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form.</p>

## **Responses to Auckland Council RMA cl 23 Requests | L8 | 2**

- 2 It is also proposed to amend assessment criterion I334.8.2(1B), which relates to assessment of taller buildings in Height Area 1, to include reference to the new policy.
- 3 This change will enable the relationship (and therefore degree of compatibility) between taller new buildings adjacent to the Former Oakley Hospital Building and the scheduled building to be assessed.
- 4 This matter is also addressed in response H3, H4 & H5 and the report by Archifact attached to this clause 23 response package.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

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**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L9
<b>Specific request</b>	Please explain how a 10m setback against Te Auaunga would achieve effective integration of new development within Height Area 1 and the adjacent Te Auaunga / Oakley Creek Reserve.
<b>Reasons for request</b>	Given that development within Height Area 1 could attain 72m and would sit on land elevated above most of Te Auaunga, it is important to know how the 10m setback would provide effective mediation between that Height Area and the reserve land.
<b>Applicant response provided by</b>	Rachel de Lambert, Boffa Miskell

**Applicant response**

- 1 Height Area 1 does not interface with Te Auaunga / Oakley Creek Reserve. As illustrated by the two images below, comprising approximately the same extent, the open space reserve area associated with Te Auaunga / Oakley Creek Reserve (refer Figure 2 area shown in green) stops short of Height Area 1 in an area adjoining the northern expanded extent of the Mason Clinic. As the maps also show, the Creek itself passes under Great North Road at this point.
  
- 2 The western / north-western / northern frontage of built development within Height Area 1 will be set back behind the protected vegetation along this boundary, which adjoins the Northwestern Cycleway. In this respect the interface will be no different to a street frontage with a 10m setback control.



Figure 1: Aerial photograph (source GeoMaps aerial photography)



Figure 2: Contours and open space zone (source GeoMaps)

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<b>Question</b>	L11
<b>Specific request</b>	Please explain how over-height development would be assessed under Criteria (1B)(b)(i) in terms of Tamaki Makaurau's "cityscape"?
<b>Reasons for request</b>	<p>The term "cityscape" is so wide-ranging that it could be meaningless. It could conceivably relate to everything from the landforms and cones of the Auckland Isthmus to the mantle of bush and landforms focused on Te Auaunga, or the cluster of structures around the Great North Rd / North-western Motorway interchange and Pt Chevalier centre. It could also refer to the mixture of MHS, MHU and Town Centre Zones found around the PC site.</p> <p>Consequently, the outcome of such assessment would entirely depend on the scale and scope of the context identified and evaluated. Notably, however, there is no reference to the Pt Chevalier Town Centre or the Oakley Hospital Building – which are both important in terms of public perception of the Pt Chevalier / Te Auaunga area.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 Matter of discretion I334.8.1(1B)(b)(i) applies to buildings within Height Area 1 greater than 35m in height.</li> <li>2 As discussed within the updated Assessment of Landscape and Visual Effects report and shown within visual simulations in the Graphic Supplement that accompanies that report, taller buildings of 35m or more in Height Area 1 will be visible from parts of the wider area, including for example, when travelling east along State Highway 16 towards the precinct (refer to VS1 in the Graphic Supplement).</li> <li>3 It is considered important that the design of taller buildings within Height Area 1, given this visibility, respond and contribute to the wider visual environment. From more distant viewing locations the overall modulation of the building's form and silhouette, its roof shape and profile, and its compositional relationship with other taller buildings within the height area, will be of greatest relevance in achieving a high quality response to this wider visual environment. From closer viewings locations, façade articulation and expression will also be of importance.</li> <li>4 The use of the term 'cityscape' in I334.8.1(1B)(b)(i) gives the Council the discretion to consider these matters when assessing a consent application for development of buildings</li> </ol>

over 35m in height in this area. It is agreed that the term is wide-ranging in its meaning, however, not to the extent that it is 'meaningless' (as suggested in the clause 23 request). The broad meaning of the term will enable consideration of the design response of a taller building in Height Area 1 to the interplay of all those features that comprise the visual environment of a wider urban area, including landform and built form. This is considered to be an appropriate degree of additional design interrogation of taller buildings in Height Area 1 given their visibility, beyond that necessary for new buildings elsewhere in the precinct, and in order to create an integrated urban environment with high quality built form and design (consistent with precinct objective I334.2(10)(a)).

- 5 There are other matters of discretion and assessment criteria that will be relevant to the Council's assessment of the effects of the design and appearance of taller buildings within Height Area 1 on the surrounding area. These include Business-Mixed Use zone matter of discretion H13.8.1(3)(a), which enables a consideration of the design and appearance of buildings in so far as it affects the amenity values of public streets and spaces used by significant numbers of people, and assessment criterion I334.8.2(1B)(a) which refers to precinct policy (13). This policy requires new buildings to be designed in a manner that recognises landscape values and, where appropriate, enhance the streetscape and gateway locations of the precinct. Both matter of discretion H13.8.1(3)(a) and precinct policy (13) would allow a consideration of streetscape effects of the design and appearance of tall buildings on Point Chevalier Town Centre as part of a broader assessment.
- 6 Assessment criterion I334.8.2(1B)(a) also refers to policy 14AA. This new policy, introduced in response to clause 23 request H7, requires high rise buildings adjacent to the Former Oakley Hospital Building (a scheduled historic heritage building) to be of a sympathetic contemporary and high quality design which enhances the precinct's built form.

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<b>Question</b>	L12
<b>Specific request</b>	Please explain why a new landmark is required under Matter of Assessment (1B)(b)(i), next to Pt Chevalier and Te Auaunga, when the Oakley Hospital Building is already a long established 'landmark' that is significant in relation to Pt Chevalier's identity and sense of place.
<b>Reasons for request</b>	Given that the Oakley Hospital Building is already a public landmark, is there any need for a (potentially) competing landmark that might degrade the very same values associated with the current heritage building.
<b>Applicant response provided by</b>	Rachel de Lambert, Boffa Miskell
<b>Applicant response</b>	
1	The Former Oakley Hospital Building was a landmark for its time, an imposing two storey building in a largely rural landscape associated with a small settlement and 'town' centre at Point Chevalier.
2	Te Auaunga Precinct occupies 64.5ha, it is intended to provide for a diverse new urban community, including the ongoing development and operation of the Unitec tertiary education facility, as well as the development and operation of a range of community, recreation, and social activities, the development of a new, compact, medium density residential community, and commercial service activities. It is the largest contiguous brownfield redevelopment site on the Auckland Isthmus.
3	Te Auaunga Precinct, like the operative Wairaka Precinct provisions, will enable a new form of mixed use urban living on this large scale urban renewal site. The urban form of the multistorey apartment typology character of development envisaged for this new community is far removed from the semi-rural, village landscape of the Former Oakley Hospital Building. It is therefore considered appropriate and desirable to provide for height variation within the precinct.
4	Height Area 1 enables the tallest buildings in the precinct with three tower typology buildings enabled at maximum heights of 72m, 54m and 43.5m respectively. Just as the relationship of the Former Oakley Hospital Building to Point Chevalier had a logic at the time, the Building's impressive scale and form in this part of the precinct, its proximity to the Point Chevalier town centre, along with other aspects of the Height Area 1 context, all contribute to this location remaining a logical place to provide for buildings that create height legibility in a far more urbanised Auckland.

- 5 Proposed matter of discretion I334.8.1(1B)(b)(i) states:
- (b) building design and location:
    - (i) In Height Area 1 on Precinct plan 3 – Te Auaunga Additional Height, how the design for any building greater than 35m in height relates to the Tāmaki Makaurau cityscape and contributes to making a visual landmark, either in isolation or as part of a composition of taller buildings such as through the architectural expression of its upper levels and rooftop;
- 6 This matter of discretion recognises that buildings of this height will establish a new landmark as part of the city’s urban landscape. In this respect the skyline profile of such buildings will comprise an important part of the landmark qualities of the three tower buildings, either individually and / or in combination. The proposed matter of discretion (1B)(b)(i) seeks the assessment of any future proposal in this regard.
- 7 It is recognised that the urban landscape of the Auckland metropolis will continue to change with an increasing emergence of more intensive forms of residential and mixed use development and taller building heights. The emergence of suburban higher rise apartment buildings on the Auckland Isthmus is already evident as a result of the city’s ‘quality compact city’ aspiration and the provisions of the Auckland Unitary Plan (Operative in Part).
- 8 Height variation is one way to create legibility within the urban form of cities, to help wayfinding and the connection of people to place. Where buildings are taller, and often observed on the skyline, particular attention to the upper levels and top of the building in terms of architectural expression can enhance the quality of the contribution of those buildings to the cityscape.



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**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L13
<b>Specific request</b>	<p>Please explain why Matter of Assessment (5)(d)(iv) addressing buildings that are over-height limits the assessment of effects to effects on the “amenity values of open spaces and adjoining residential areas.” This does not consider effects on:</p> <ul style="list-style-type: none"> <li>• Local streetscape values;</li> <li>• The natural values of Te Auaunga;</li> <li>• The Town Centre character and identity of Pt Chevalier; or</li> <li>• The heritage values of the Oakley Hospital Building.</li> </ul>
<b>Reasons for request</b>	<p>Excessive height has the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.</p>
<b>Applicant response provided by</b>	<p>Matt Riley, Boffa Miskell; Rachel de Lambert, Boffa Miskell; and John Duthie, Tattico</p>
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 Matter of discretion I334.8.1(5) is carried over from the operative Wairaka Precinct and is the provision within that operative precinct which specifies the matters to which Council’s discretion is restricted in assessing proposed developments and/or subdivision within the precinct that do not comply with listed standards, including I334.6.4 Height.</li> <li>2 The operative precinct already provides for a high density urban community. It was not considered necessary when constructing the operative precinct provisions to specify a subset of matters that may be considered by Council, such as local streetscape values, the natural values of Te Auaunga, the Town Centre character and identity of Point Chevalier, or the heritage values of the Former Oakley Hospital Building. These are features which Council already has the ability to consider in accordance with the general matter of discretion to consider effects of infringement of standards, including the Height standard. The plan change does not change that approach, nor is it considered necessary to do so in order to appropriately manage potential adverse effects from over-height buildings within the precinct.</li> <li>3 Council’s discretion to assess the effects of buildings that are over-height is not limited to I334.8.1(5)(d)(iv). This clause is part of the wider matters of discretion (I334.8.1(5)) that</li> </ol>

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includes all those matters listed in Auckland Unitary Plan (Operative in Part) (AUP) Rule C1.9(3). Those matters are:

- (a) any objective or policy which is relevant to the standard;
- (b) the purpose (if stated) of the standard and whether that purpose will still be achieved if consent is granted;
- (c) any specific matter identified in the relevant rule or any relevant matter of discretion or assessment criterion associated with that rule;
- (d) any special or unusual characteristic of the site which is relevant to the standard;
- (e) the effects of the infringement of the standard; and
- (f) where more than one standard will be infringed, the effects of all infringements considered together.

4 This provides to Council a wide discretion to consider the effects of height infringements, including those potential effects referred to in the clause 23 request. It is not considered necessary to refer to specific matters, for example, those listed in the clause 23 request, as these are already encompassed within these broad matters of discretion. This is consistent with the style in which matters of discretion for considering height infringement are drafted in both AUP zones and other operative precincts that the writers are aware of.

5 By way of example of the breadth of discretion provided to Council in Rule C1.9(3) to consider the effects of any proposed over-height building within the precinct, C1.9(3)(e) does not restrict the effects that may be considered, and via C1.9(3)(a), there are a number of objectives and policies that are of relevance to height that will allow decision-makers to conduct a broad consideration of effects from a height-infringing building and assessment of how building design addresses such effects. Relevant underlying zone objectives and policies (using the Business – Mixed Use zone as an example) and precinct objectives and policies (as proposed to be amended through the plan change) are:

### Business – Mixed Use zone objectives and policies

Objective H13.2(3): Development positively contributes towards planned future form and quality, creating a sense of place.

Policy H13.3(3): Require development to be of a quality and design that positively contributes to:

- (a) planning and design outcomes identified in this Plan for the relevant zone;
- (b) the visual quality and interest of streets and other public open spaces; and
- (c) pedestrian amenity, movement, safety and convenience for people of all ages and abilities.

Policy H13.3(5): Require large-scale development to be of a design quality that is commensurate with the prominence and visual effects of the development.

### Precinct objectives and policies

Objective I334.2(10): An integrated urban environment is created, which:

- (a) Incorporates high quality built form and design;

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- (b) Recognises, protects and enhances the environmental attributes of the precinct in its planning and development;
- (c) Avoids, mitigates and remedies adverse effects on the environment and existing stormwater, wastewater and road/s infrastructure, recognising that the precinct stormwater system services areas beyond the precinct boundary;
- (d) Is developed in a comprehensive manner, which complements and fits within the landscape and character of the surrounding environment;
- (e) Contributes positively to the Mt Albert, Waterview and Point Chevalier communities; and
- (f) Contributes to Māori cultural promotion and economic development.

Policy I334.3(13): Require new buildings to be designed in a manner that provides for a high standard of amenity, recognises landscape values and, where appropriate, enhances the streetscape and gateway locations of the precinct.

Policy I334.3(14): Require proposals for new buildings, structures and infrastructure or additions to existing buildings, structures and infrastructure adjoining or adjacent to the significant ecological area of Te Auaunga to be sympathetic and provide contemporary and high-quality design, which enhances the precinct's built form and natural landscape.

Policy I334.3(14AA): Require proposals for new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form.

- 6 In addition to I334.8.1(5), Council may consider the potential effects of over-height buildings via the matters of discretion listed in I334.8.1(1B). Reference should also be made to the response to the L11 clause 23 request, where this provision is discussed in detail.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L14
<b>Specific request</b>	It is noted that Policy (14) under Built Form does not address the issue of a sympathetic relationship between new development and the scheduled, Oakley Hospital Building.
<b>Reasons for request</b>	Providing some form of sympathetic relationship between the Oakley Hospital Building and new development within Height Area 1 (especially) appears to be fundamental to the findings in the DPA Architects' heritage assessment and also appears to influence – to a lesser degree – the findings in BML's report. However, it will be difficult to achieve such positive engagement without directly applicable policies.
<b>Applicant response provided by</b>	John Duthie of Tattico
<b>Applicant response</b>	
1	This is a non-clause 23 matter.
2	It relates to the design relationship between the Former Oakley Hospital Building and the new high-rise built form allowed within Height Area 1.
3	HUD requested Mr Wild of Archifact to undertake a review of the heritage provisions of the Former Oakley Hospital Building and in particular the juxtaposition of this building and the high rise development.
4	This is addressed extensively in his report which is attached to this response package.
5	As a result of that work a new Policy 14AA is proposed. This is addressed in clause 23 response H7. Other relevant matters to the design relationship are discussed in clause 23 response H3, H4, and H5.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L15
<b>Specific request</b>	The heights and built forms proposed within Height Area 1 are exceptional in all respects. It is noted that Policies (11) to (14B) under Built Form do not reflect this 'exceptionality' in terms of the built form outcomes to be achieved within that Height Area.
<b>Reasons for request</b>	Given the prominence of the 'towers' anticipated within Height Area 1 and their very significant deviation from the height standards associated with the Town Centre, MHU and THAB Zones nearby, they should ideally be of a design standard that reflects their 'exceptionality'. In effect, their design qualities should be more than just of a 'high quality' (14) to justify the increased heights that can be achieved within Height Area 1. However, the current policies do not appear to reflect such an approach.
<b>Applicant response provided by</b>	John Duthie of Tattico and Matt Riley of Boffa Miskell
<b>Applicant response</b>	
1	This is a non-clause 23 matter.
2	Tattico and Boffa Miskell do not accept the premise of this statement that the plan change does not seek buildings of high or 'exceptional' quality.
3	In particular: <ul style="list-style-type: none"> <li>(a) All new buildings and alterations to existing buildings (other than minor alterations less than 250m<sup>2</sup> and new development that meets the Medium Density Residential Standards in the residential zones in Sub-precinct C) will require resource consent and assessment by the Council as a restricted discretionary activity.</li> <li>(b) The objectives and policies of the precinct seek to retain a high quality of development across all buildings, be they 11m, 27m, 35m or located in Height Area 1 which enables up to three high rise towers in the north western area of the precinct.</li> <li>(c) The objectives and policies set the framework for the quality of this development.</li> <li>(d) Complementing this is an extensive set of matters of discretion and assessment criteria for new buildings. These have been expanded beyond those of the current Wairaka Precinct provisions and those of the Auckland Unitary Plan (Operative in Part) (AUP).</li> </ul>

## Responses to Auckland Council RMA cl 23 Requests | L15 | 2

- 4 The urban design analysis is that these criteria will result in the delivery of high quality buildings throughout the precinct including for the high rise buildings in the north-western portion of the precinct.
- 5 The author of this comment seems to be drawing a distinction between 'high quality' and 'exceptional quality'.
- 6 The AUP provides for other high rise tower buildings throughout the region including in areas such as the Wynyard Quarter, Smales Farm, Orewa, Britomart, Sylvia Park, and Ōrākei. In these locations, the plan refers to 'high quality'.
- 7 We have reviewed the AUP and could find only one use of the term 'exceptional quality' within the plan, being in the assessment criteria for buildings of up to 27m in height in development area 4 within the Landing Sub-precinct.
- 8 In contrast to this singular reference, even in highly sensitive locations and additional height areas, the plan refers to 'high quality'.
- 9 In our view, the correct approach is therefore to keep the language of the plan consistent which, as we understand it, currently predominantly refers to 'high quality'.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

L16

**Specific request**

It is noted that Policies (11) to (14B) under Built Form do not address the issue of achieving high quality built forms within Height Area 2 near Carrington Road and visual sympathy or compatibility with development in the MHU and THAB Zones across that road corridor.

**Reasons for request**

There are likely to be significant built form disparities between the 10-11 storey development anticipated within Height Area 2 and that which can occur (as of right) in the THAB and MHU Zones across Carrington Road. Consequently, the achievement of high quality design and built forms that are sympathetic to that within the 'lower' THAB and MHU Zones would seem central to achieving high quality streetscapes and a high quality urban landscape. However, this important relationship is not addressed in the current Built Form policies.

**Applicant response provided by Applicant response**

John Duthie of Tattico and Matt Riley of Boffa Miskell

- 1 This question raises the relationship between Height Area 2 and development enabled across the Carrington Road corridor and whether the relevant policy framework in the proposed plan change appropriately addresses achieving high quality built forms within Height Area 2 in respect of this relationship.

*Height Area 2 and Carrington Road corridor relationship*

- 2 The two areas which comprise Height Area 2 are some distance back from the Carrington Road frontage (with the closest part of Height Area 2 being largely 50m from the road boundary); are on generally low lying land, and are separated from Carrington Road by Height Area 4.
- 3 For these reasons, any built form in these height areas up to the proposed enabled height of 35m is considered to not be overly prominent to Carrington Road, such that a specific policy managing potential effects from buildings in Height Area 2 on Carrington Road and properties opposite is not considered necessary.
- 4 Refer Attachment 1: Te Auaunga Precinct Height Areas and Contours, which shows the distance of the closest Height Area 2 location from Carrington Road and major contour lines. Also refer to VS10B and VS11B in the updated Landscape and Visual Effects Graphic Supplement, where bulk enabled under Height Area 2 is not visible from Carrington Road behind Height Area 4 along the frontage.

*Proposed precinct provisions*

- 5 This plan change request and the provisions within the plan change appropriately require high quality built forms across the precinct and address the Carrington Road corridor as they:
- (a) Identify the appropriateness of providing for urban intensification within the Te Auaunga Precinct given its location in terms of distance to the central city, distance to the town centres of Point Chevalier and Mount Albert, and proximity to the key public transport routes including bus and rail, infrastructure, and the topography of the precinct which supports more intensive built form.
  - (b) Make all buildings (other than minor alterations) subject to a restricted discretionary resource consent to enable the Council to assess the urban design merits of any proposal (noting that buildings that comply with the Medium Density Residential Standards provisions in the underlying residential zones will be permitted).
  - (c) Set extensive criteria to ensure the appropriateness and quality of new development with additional criteria applicable to the Carrington Road frontage (I334.8.1(1A)(i)).
  - (d) Require an ~8m building line along Carrington Road. This means the future total Carrington Road width will now be a ~28m wide corridor. Auckland Transport is still to finalise decisions on design however the corridor is likely to include dedicated busways, cycle lanes, and footpaths with associated street landscaping. The Crown has provided \$113.2 million in funding towards the Carrington Road widening.
  - (e) The additional assessment criteria address issues including the bulk and form of buildings and streetscape.
- 6 Additionally, the assessments submitted in support of the plan change addressed height across Carrington Road as follows:
- (a) The section 32 report, including the Urban Design Assessment by Boffa Miskell, address the height across Carrington Road.
  - (b) The eastern side of Carrington Road is characterised by:
    - (i) Special Purpose Health zoning with a permitted activity height of 26m and a restricted discretionary to 35m;
    - (ii) Residential – Terrace Housing and Apartment Building zoning; and
    - (iii) Residential – Mixed Housing Urban zoning.
  - (c) The Boffa Miskell analysis contrasts these heights and the impact of new development with a ~28m street corridor (refer section 5.2.1 of the Urban Design Assessment). It also contrasts the difference between what is effectively a 12m setback to a 27m height limit versus allowing that height limit to the new Carrington Road frontage once the 8m road widening is taken into account.
  - (d) That analysis finds that the plan provisions are appropriate and through the required resource consent process appropriately manage the effects of the development. Assessment criteria apply to buildings fronting Carrington Road. This will enable the built form quality to be delivered.



**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** L17

**Specific request** It is noted that Policies (17) to (19) do not address integration of the Plan Change site's streets, pedestrian thoroughfares and cycleways with the North-western Cycleway, the Great North Rd / Te Auaunga Cycleway / walkway, Carrington Rd and Phyllis Street Reserve.

**Reasons for request** The Plan Change site is highly connected to a range of walkways, cycleways, reserves and key roads at present. These connections contribute very appreciably to both local and regional use of the local area, and the local area's amenity. Consequently, these connections need to be maintained and this should be reflected in the relevant PC provisions.

**Applicant response provided by** Rachel de Lambert, Boffa Miskell

**Applicant response**

1 The question seeks that the plan change formalise connections between the precinct and the surrounding public network, including the Northwestern Cycleway, the Great North Road / Te Auaunga Cycleway / walkway, Carrington Road and Phyllis Street Reserve through the precinct provisions.

2 With respect to connectivity, operative Wairaka Precinct Policy 19 (with minor updates proposed through the plan change) reads:

Establish a network of roads which give public access through the precinct and ~~at~~the pedestrian and cycling connections to ~~the Oakley Creek~~Te Auaunga and Waterview pedestrian/cycle bridge.

3 Although Policy 19 does not list all the cycleways and walkways above, it should be read alongside Precinct plan 1, which makes provision for formal linkages between and within the precinct, and all the roads, cycleways, walkways and parks listed above, including south through the Ngāti Whātua land connecting to Phyllis Reserve, Carrington Road, and the Waterview Shared Path (as shown on the updated Precinct plan 1 provided with the clause 23 responses). Public access is not explicitly provided for in Policy 19 outside these key public networks, as scope has been left for neighbourhoods within the precinct to provide for their own logical local / internal connections.

- 4 However, the consented road, cycling and pedestrian networks in BUN60386270 (Centre/North), BUN60373075 (Wairaka Stream daylighting and pedestrian connection) and the Wairaka Precinct Stage 1 Project (South), establish the networks shown on Precinct plan 1, and anticipate the vesting of the majority of this network as public infrastructure, with a couple of minor exceptions such as the connection between the centre/north Spine Road and the south, which will be restricted to cyclists and pedestrians along the Waterview Shared Path. The Waterview Shared Path is not affected by the plan change.
- 5 The description below is of the updated Precinct plan 1, and the networks provided for in these consents. Precinct plan 1 shows the future network of roads, cycleways and walkways within the precinct, including:
- (a) Public road and dedicated cycleway connections between the precinct and two entrances / exits onto Carrington Road – currently known as Gates 1 and 3 – all connected by the Spine Road which runs the length of the precinct. A new cycleway connection east – west positioned to the north of the Former Oakley Hospital Building is included in Precinct plan 1, supporting connectivity to the Northwestern Cycleway. These networks provide both east/west and north/south connections for cyclists and pedestrians (as explicit on the map legend), and also for cars – albeit a vehicle connection between the centre/north and the south of the precinct is not anticipated due to other provisions within the Auckland Unitary Plan (Operative in Part) that are unchanged through this plan change (refer to clause 23 response T3). The cycling connections shown throughout the precinct are part of this plan change.
  - (b) An additional public road connection for pedestrians, and vehicles between the Spine Road and Gate 2 (where no separate cycling connection is shown or planned for, due to topographical constraints (i.e. steepness) within the natural landform of the precinct along this route).
  - (c) Public road connections between the precinct and Laurel, Renton, Rhodes and Mark Streets in the south, with the Laurel Road connection also abutting Phyllis Reserve. The Mark Road connection, in particular, is part of this plan change and enhances the permeability – and therefore the connectivity – between the precinct and the southern residential neighbourhoods.
  - (d) Public cycleway/pedestrian connections between the precinct and Te Auaunga and Waterview Shared Paths in the south and centre, which connect the precinct through to Great North Road. This shared path then re-enters the precinct as the Northwestern Cycleway at its current entry point on the Rainbow Path, as also shown.
  - (e) A new connection directly across the Northern park, which will enhance the connectivity for local cyclists and pedestrians between the precinct and the Northwestern Cycleway on updated Precinct plan 1 provided with this clause 23 response package.
  - (f) A new public pedestrian connection between the pedestrian network on the Spine Road and Te Auaunga / Oakley Creek, directly south of the Mason Clinic, which is supplemented by an open space area.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L18
<b>Specific request</b>	It is noted that Policies (17) to (19) do not address streetscape values, both within the Precinct and on its margins – notably down Carrington Road.
<b>Reasons for request</b>	The provision of high quality streetscapes is fundamental to the increased development intensity and more elevated building heights proposed – both in terms of urban character / aesthetics and functionality. However, the achievement of such qualities is not addressed at present. In my view, this matter is fundamental to achieving a high quality urban environment and should be addressed in this section.
<b>Applicant response provided by</b>	John Duthie of Tattico and Matt Riley of Boffa Miskell
<b>Applicant response</b>	
1	This is a non-clause 23 matter.
2	The comment requests that HUD include a policy relating to streetscape values.
3	HUD considers that the plan change as submitted already addresses this matter. The objectives and policies applying to the land are extensive as they relate to streetscapes both directly and indirectly. Those policies include the precinct provisions and underlying Business – Mixed Use zone provisions, including the following in particular:

**Precinct**

**Objective 10:** An integrated urban environment is created, which:

- (a) Incorporates high quality built form and ~~urban~~ design;

*(as proposed to be amended through the plan change)*

**Policy 13:** Require new buildings to be designed in a manner that provides for a high standard of amenity, recognises landscape values and, where appropriate, enhances the streetscape and gateway locations of the precinct.

**Business – Mixed Use zone**

**Objective 3:** Development positively contributes towards planned future form and quality, creating a well-functioning urban environment and a sense of place

*(as proposed to be amended through Plan Change 78)*

**Policy 3:** Require development to be of a quality and design that positively contributes to:

- (a) planning and design outcomes identified in this Plan for the relevant zone;
- (b) the visual quality and interest of streets and other public open spaces; and
- (c) pedestrian amenity, movement, safety and convenience for people of all ages and abilities.

**Policy 4:** Encourage universal access for all development, particularly medium to large scale development.

**Policy 5:** Require large-scale development to be of a design quality that is commensurate with the prominence and visual effects of the development.

**Policy 7:** Require at-grade parking to be located and designed in such a manner as to avoid or mitigate adverse effects on pedestrian amenity and the streetscape.

- 4 The Council comment says “It is noted that Policies (17) to (19) do not address streetscape values, both within the Precinct and on its margins – notably down Carrington Road.”
- 5 There are other objectives and policies that do address streetscape values, as set out above. These provisions set up the foundation/framework for what follows in the matters of discretion for new buildings (I334.8.1). In particular, Policy 13 directly references streetscapes. This applies to all roads (existing and new) including Carrington Road.
- 6 The precinct provisions as proposed therefore appropriately address streetscape values.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L19
<b>Specific request</b>	<p>It is noted that the Matters of Assessment for over-height buildings in I334.8.1(1B) do not address such matters as:</p> <ul style="list-style-type: none"> <li>• Effects on the A13 Volcanic Viewshaft;</li> <li>• Visual over-dominance;</li> <li>• Over-shadowing outside the Equinox periods;</li> <li>• Effects on privacy;</li> <li>• The streetscapes of Great North Road, Carrington Rd and the Pt Chevalier centre;</li> <li>• Effects on the MHS and MHU Zones south and east of the PC site;</li> <li>• Effects on Te Auaunga; and</li> <li>• Effects on the heritage values of the Oakley Hospital Building.</li> </ul>
<b>Reasons for request</b>	<p>The assessment criteria for breaches of the Height Controls are effectively the same as for those that comply with the proposed height controls. As such, they mostly address matters applicable to the internal qualities of the PC site and fail to address potential effects that are fundamental to the manner (and degree) to which development across the PC site would 'fit into' its wider surrounds and landscape setting.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell; and John Duthie, Tattico
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 In addition to I334.8.1(1B), Council's matters of discretion for considering the effects of over-height buildings are also listed in I334.8.1(5). This provision is discussed in detail in the response to clause 23 request L13.</li> <li>2 I334.8.1(5) enables Council to undertake a broad assessment of the potential effects of an over-height building, including all those matters listed in the clause 23 request, both within the precinct and in respect of effects on areas outside it.</li> <li>3 In addition, specifically with respect to Auckland Unitary Plan (Operative in Part) (AUP) A13 matters, the A13 Volcanic Viewshaft to Ōwairaka / Mount Albert from State Highway 16 causeway passes over the southern part of the precinct at heights ranging from approximately 31.5m to 51.5m. It is not proposed to increase maximum building height</li> </ol>

## **Responses to Auckland Council RMA cl 23 Requests | L19 | 2**

in this area beyond the heights enabled in the operative Wairaka Precinct. Existing consents in this area are for lower height buildings, sitting beneath the floor of the Viewshaft. The areas proposed through the plan change to accommodate greater height are well clear of the Viewshaft.

- 4 The operative precinct does not reference the Viewshaft as a matter of discretion or assessment when considering the effects of an over-height building. Any building in that part of the precinct over which the Viewshaft passes and which extends into it will be assessed under the provisions in AUP Chapter D14. It is not considered necessary to change this approach in the plan change.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

L20

**Specific request**

It is noted that Matter of Assessment (5)(d)(vi) addressing buildings that fail to meet the precinct boundary set back control limits the assessment of effects to “neighbouring sites, building scale and dominance (bulk and location), and outlook and privacy.” This does not consider effects on the wider public domain, including local streetscapes, the town centre and Te Auaunga.

**Reasons for request**

Breaches of the precinct boundary set back have the potential to affect far more than just adjoining open spaces and residential properties. However, the current Matters of Assessment are very limited in this regard. They should address a range of matters that impact on both the public and private domains.

**Applicant response provided by**

Matt Riley, Boffa Miskell; and John Duthie, Tattico

**Applicant response**

- 1 Assessing the effects of an infringement of the precinct boundary setback standard I334.6.6 is not limited to I334.8.1(5)(d)(vi). This clause is part of wider matters of discretion (I334.8.1(5)) that, via I334.8.1(5)(a), provide to Council the discretion to assess an infringement of I334.6.6 under Auckland Unitary Plan (Operative in Part) Rule C1.9(3).
- 2 Matter of discretion I334.8.1(5) is carried over from the operative Wairaka Precinct and is the provision within that operative precinct which specifies the matters to which Council's discretion is restricted in assessing proposed developments and/or subdivision within the precinct that do not comply with listed standards, including I334.6.6 Precinct boundary setback.
- 3 As is discussed in detail in response to clause 23 request L13, the ability to use Rule C1.9(3) in the assessment of an infringement of a standard listed in I334.8.1(5), which includes standard I334.6.6, provides to Council a broad discretion to consider the potential effects of the infringement, including those potential effects referred to in clause 23 request L20. It is not considered necessary to change the approach used in the operative precinct in the plan change to refer to a subset of specific matters, for example, those listed in this clause 23 request, as these are already encompassed within these broad matters of discretion, and – as noted in the clause 23 L13 response – neither is this the approach used within other operative precincts more generally.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	L21
<b>Specific request</b>	It is noted that over-height development is proposed to be assessed against Policies I334.3 (14A) & (14B) which actively support 'taller buildings', rather than providing a foundation for critical evaluation of such structures.
<b>Reasons for request</b>	Policies I334.3 (14A) & (14B) provide clear support for exceptionally tall built forms. However, they do not address the degree of 'fit' that such proposals would have in relation to their surrounds (and existing development, such as the Oakley Hospital Building) or the effects that they might generate.
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell; John Duthie, Tattico

**Applicant response**

- 1 The foundation for a balanced critical evaluation of both the potential positive and adverse effects of height infringing tall buildings is provided for in the precinct provisions. As detailed in the other clause 23 responses, it is considered that the precinct is an appropriate location for taller buildings, and therefore it is appropriate that the provisions provide active policy support for these buildings.
- 2 The provisions enable the effects of taller buildings in Height Area 1, and height infringing buildings more generally, to be evaluated via two pathways: matter of discretion I334.8.1(1B) and matter of discretion I334.8.1(5).

**Matter of discretion I334.8.1(1B)**

- 3 Assessment criterion I334.8.2(1B), which stems from matter of discretion I334.8.1(1B), enables assessment of the potential effects of the three taller height compliant buildings in Height Area 1 (of 43.5m, 54m and 72m height, as specified on Precinct plan 3) *and* also any building which exceeds the heights specified for the Height Areas in Precinct plan 3.
- 4 The criterion refers to Policies I334.3(13), (14), (14A), (14AA) and 14(B). Policies I334.3(14A) and (14B) set the foundation for the positive effects of taller buildings in the north western part of the precinct and increased height in the central and northern parts of the precinct. These policies are balanced against Policies I334.3(13), (14) and (14AA), which, together, enable an evaluation of the extent to which the potential adverse effects of this greater height are appropriately mitigated through place-responsive design. In summary:



## Responses to Auckland Council RMA cl 23 Requests | L21 | 2

- (a) Policy I334.3(13) requires new buildings to be designed in a manner which recognises landscape values and, where appropriate, enhances the streetscape and gateway locations of the precinct;
- (b) Policy I334.3(14) requires new buildings adjoining or adjacent to Te Auaunga to provide appropriate native landscaping and contemporary high-quality design which enhances the precinct's built form and natural landscape; and
- (c) New Policy I334.3(14AA), introduced in response to clause 23 request H7, requires new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form.

### **Matter of discretion I334.8.1(5)**

- 5 Matter of discretion I334.8.1(5) is an additional pathway for assessing height infringing buildings. It provides Council with discretion to assess the effects of 'any development and/or subdivision' that does not comply with specified standards, including I334.6.4 Height. This includes an assessment of potential effects of a height infringing building against Auckland Unitary Plan (Operative in Part) (*AUP*) rule C1.9(3) (via I334.8.1(5)(a)) and the potential effects on the amenity values of open spaces and adjoining residential areas (via I334.8.1(5)(d)(iv)).
- 6 *AUP* rule C1.9(3) allows a broad assessment of the potential effects of an infringement of the height standard, enabling Council to consider matters including: any objective or policy which is relevant to the standard; any special or unusual characteristic of the site which is relevant to the standard; the effects of the infringement of the standard; and where more than one standard is infringed, the effects of all infringements considered together.
- 7 Assessment of a height infringing building through rule C1.9(3) would, for example, allow consideration of the extent to which the building is consistent with the over-arching outcomes sought for development within the precinct by Objective I334.2(10). This objective anticipates that buildings will contribute to the creation of an integrated urban environment which incorporate high quality design, and that the precinct is developed in a comprehensive manner which complements and fits within the landscape and character of the surrounding environment.

### **Conclusion**

- 8 In summary, it is considered that the precinct provisions appropriately address the 'fit' (as referred to in the clause 23 request) of taller buildings within the precinct to their surrounds through a balanced foundation at objective and policy level, and through matters of discretion that enable a broad assessment of potential effects of taller buildings and of any height infringing building.

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
***Amending I334 Wairaka Precinct***

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	E1
<b>Specific request</b>	Please provide a map identifying the spatial extent and area (m2) of vegetation types, streams and wetlands.
<b>Applicant response provided by</b>	Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 A new map has been provided showing the requested updates, please refer to Appendix 1.
- 2 Note that areas of rank grass previously mapped have not been included as this area has been modified and as of 31/03/2023 and is now largely a construction site and has been denuded of vegetation.
- 3 Refer Appendix 1.

<b>Question</b>	E2
<b>Specific request</b>	Please provide fuller descriptions of the diversity (flora and fauna communities) and structure (canopy, subcanopy, ground cover) of identified areas of ecological value and categorise, where appropriate, in accordance with Auckland Council's indigenous ecosystem types (e.g e.g. WF4, WF8, Singers et al. 2017).
<b>Applicant response provided by</b>	Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 Owing to the historical modifications of the precinct (see the photo-series provided in Appendix 2) the vegetation remaining on-site is not reflective of any naturally occurring vegetation community.
- 2 The majority of the vegetation on-site is comprised of individual exotic trees. Singers et al. (2017) provides 2 categories for where exotic vegetation dominates: Exotic Forest (EF) and Exotic Scrub (ES). Given these species would normally comprise a canopy these areas would be best described as EF, which is described as: Forest vegetation with >50% cover of exotic species in the canopy. The isolated mature trees are generally without a sub-canopy with a groundcover of mown grass. This would include the willows (*Salix* spp.) that had been considered in the 'Exotic riparian vegetation'.

- 3 Where vegetation has not been maintained for amenity purposes, including the 'Mature mixed canopy', the canopy is comprised of individual specimens of pohutakawa (*Metrosideros excelsa*) and kahikatea (*Dacrycarpus dacrydioides*), there are also mature specimen trees likely planted and being maintained as ornamentals including large puriri (*Vitex lucens*), Norfolk Island pines (*Araucaria heterophylla*), magnolia and Moreton Bay fig (*Ficus macrophylla*). The understory is comprised of self-seeded natives, largely karamu (*Coprosma robusta*), karo (*Pittosporum crassifolium*), tarata (*Pittosporum eugenioides*), and less commonly, juvenile nikau (*Rhopalostylis sapida*), karaka (*Corynocarpus laevigatus*) and kawakawa (*Piper excelsum*). Groundcover is majority leaf litter with a garden bed of *Agapanthus* alongside Mt Albert Road. Owing to the dominance of exotics, the area would be most appropriately captured by the EF: in Singers et al 2017.
- 4 For the vegetation categorised as 'Native riparian vegetation', the canopy is limited to a mixture of manuka (*Leptospermum scoparium*) and kanuka (*Kunzea ericoides*), the understory, where present is comprised of large flax and karamu. Owing to the dominance of manuka, such areas would be best captured by the Singers et al. 2017 category of VS3: Manuka, kanuka scrub.
- 5 A Current Ecological Value Assessment utilising the EIANZ assessment framework has been set out for each vegetation type in Appendix 3. Note that in disaggregating the values assessment across the different vegetation types gives three different values; overall these average 'Low' ecological value which is consistent with the EcIA and commensurate with the extent of each different vegetation type.
- 6 Refer Appendix 1, Appendix 2, Appendix 3.

**Question** E3

**Specific request** Further to E2 (above), please provide commentary on the potential presence of rock forest with descriptions of substrate where vegetation cover is mapped in RFI E1 (above).

**Applicant response provided by** Jason Smith – Morphem Environmental Limited

**Applicant response**

- 1 There is no rock forest present within the plan change area. References to rock forest in the riparian margins of Te Auaunga/Oakley Creek are noted from the literature review, there are records of rock forest in the riparian margins of Te Auaunga, notably in Phyllis Street and Harbutt Reserves which are to the south of the plan change area. There are two exposed rock outcrops within the plan change area which are either unvegetated or covered with exotic grasses. Elsewhere exposed rock has been fashioned into a rock wall to the south of the Central Wetland.

**Question** E4

**Specific request** Please provide an updated database review of indigenous bird species to account for potential and intermittent presence of At Risk or Threatened species, particularly aquatic species around the wetland, where vegetation will have matured since the Boffa Miskell assessment. Please also provide commentary on the effects of the proposed plan change on any additionally identified species, with respect to urban intensification, increased building height and reduction in extent of open space.

**Applicant response provided by** Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 The desktop review for avifauna has been updated and expanded to include a wider area, please refer to Table 1 in Appendix 4.
- 2 The only significant changes to the vegetation community within the precinct since the Boffa Miskell Assessment (2014) is the maturation of the planting associated with the stormwater management device alongside the Trades Building/Farm Road; and the removal of individual large specimen trees or amenity garden vegetation from the northern half of the precinct.
- 3 The vegetation currently present was planted during the construction of the 'Stormwater Management Device' and includes kowhai (*Sophora microphylla*), flax (*Phormium tenax*) and cabbage trees (*Cordyline australis*) interspersed amongst a ground cover of oioi (*Apodasmia similis*). The area also features a range of pest plants that have colonised the area including wattle species (*Acacia* spp.), dock species (*Rumex* spp.), inkweed (*Phytolacca octandra*), black nightshade (*Solanum nigrum*), broad-leaved fleabane (*Erigeron bonariensis*), wild carrot (*Daucus carota*) and exotic grasses (*kikuyu*, *Cenchrus clandestinus*) in the terrestrial margin.
- 4 The vegetation community on the riparian margin of the 'Central Wetland' is comprised of the native riparian vegetation community described above, generally only a single pole deep. Raupo has establish in the near-shore margin.
- 5 The surface water within the stormwater management devices are covered in a mixture of aquatic weeds such as both willow weed (*Persicaria maculosa*) and water pepper (*Persicaria hydropiper*).
- 6 Whilst the desktop review includes a wider range of native avifauna, the stormwater management devices would not be considered to provide habitat for the majority of these coastal species.
- 7 The At Risk or Threatened species noted from the desktop review could conceptually include banded rail (At Risk – Declining) and gull species (At Risk or Threatened depending on species).

- 8 However, the riparian margin is a relatively small area, and isolated from areas of similar habitat by stream reaches that lack overhead cover which banded rail would utilise as movement corridors. Furthermore, given the exposed nature of the small area (being largely surrounded by mown grass and in close proximity to existing urban development) the area is unlikely to provide habitat for banded rail.
- 9 Gull species have adapted to forage within a wide range of urban environments. The vegetation near the stormwater management devices will comprise a very small portion of similar low-quality nesting/foraging habitat within the home range for any gull species.
- 10 Refer Appendix 4.

**Question**

E5

**Specific request**

Please justify why the likelihood of bat roosting habitat is considered 'negligible' if potential roost habitat along Te Auaunga is considered to hold potential and given that native bats have very large home ranges. Further, if potential bat habitat is acknowledged as possible within the precinct, please comment on the potential effects of the plan change, including urban intensification (including increased light levels, building height) and reduction in open space on access by bats to potential foraging, flight and roost habitat (e.g. mature tree groves), noting that bats use open spaces and wetlands and other water bodies.

**Applicant response provided by**

Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 Bat habitat within the precinct has been considered as negligible on the basis that the vegetation within the precinct has been managed over a significant period of time for amenity purposes and as such lacks the hollows and cavities that would provide bat roosts. This is exemplified by the photographs provided in Appendix 5 that demonstrate how lower or fallen limbs have been anthropogenically removed to prevent the occurrence of hollows.
- 2 The potential for bats to utilise such trees is further reduced by the isolated nature of the individual trees within the precinct, and the existing urban development.
- 3 Should Auckland Council take an alternative view, it is noted that the plan change seeks to vary existing precinct provisions (as set out in section 3 of the EcIA) which already provide for significant development within the precinct, and therefore which would not substantially alter the current planning provisions that would impact on bat values given these existing provisions and the current urbanisation of the catchment which includes the north-western motorway, Great North Road and the associated fly-overs.
- 4 There is a greater extent of higher quality bat roosting and foraging habitat outside of the plan change area, within the riparian margin of Te Auaunga, where vegetation has not been actively maintained. The exotic canopy trees (including copses of pines, oaks and gum spp. would have the loose bark and hollows for bat roosts).

5 Refer Appendix 5.

**Question** E6

**Specific request** Please provide evidence to illustrate that both of these wetlands individually are classified as “a deliberately constructed wetland”, and therefore are excluded from the definition of “natural inland wetland” as defined in the NPS-FM.

Update Map in Appendix 1 of the Ecological Report accordingly.

**Applicant response provided by** Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 The ‘Stormwater Management Device’ is deliberately constructed. As evident from the photo-series provided in Appendix 2, there is no natural watercourse in this location preceding the construction of the stormwater management device in (2015 – 2017).
- 2 The earliest aerial imagery available for the area of the ‘Central Wetland’ (1940) is after any natural vegetation has been cleared and the catchment transformed for agricultural purposes. The historic aerial imagery is interpreted to show that a drain has been created in this area, evidenced by the straight, linear and well-defined watercourse. The area lacks any darker colouration in the immediately area surrounding the watercourse that would indicate a wetland.
- 3 The artificial nature of the ‘wetland’ aspect is elaborated on in the memorandum from Auckland Council prepared for Unitec’s resource consent application for damming of water and use of an existing dam on the bed of a tributary of Oakley Creek for stormwater treatment in 2015 and attached as Appendix 6. This memorandum considers that the Central Wetland was formed deliberately as a dam for constructing and demonstrating stormwater ponds.
- 4 Note that this is not considered to be a natural wetland as defined in the NPS: FM; however, given the previous occurrence of a waterway in this location it could still be considered a modified element of a natural watercourse (stream) for the purposes of the Auckland Unitary Plan and Resource Management Act.
- 5 The plan change does not propose any amendments to the provisions of E3 (streamworks) in the AUP nor any activities that would detract from the value, or opportunity to restore these waterbodies.
- 6 Refer Appendix 2, Appendix 6.

**Question** E7

**Specific request** Map and describe the natural wetland referred to in the ecological report at the confluence with Te Auaunga.

Please update Map in Appendix 1 of the Ecological Report accordingly.

**Applicant response provided by** Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 Through the Mason Clinic, the Wairaka Stream remains heavily incised and lined by rock and would be considered to reflect a stream environment.
- 2 As the Wairaka Stream exits the Mason Clinic site, within the riparian vegetation as the stream reaches the lower relief of Te Auaunga, it would appear that the stream frequently floods. There is an isolated stand of Purei (*Carex secta*) on the true left bank and where groundcover exists it is dominated by alligator weed.
- 3 Based on the previous site investigations (as this area is off-limits to the public for public safety), this area could pass the rapid test for wetland vegetation depending on the sample location.
- 4 Refer to Figure 2 in Appendix 7 for an indicative site photograph, which was taken from the point marked Photo point 2 in the map provided as Appendix 1.
- 5 This is outside of the plan change area, and the plan change does not propose any amendments to the provisions of the AUP nor any activities that would detract from the value, or opportunity to restore this area.
- 6 Refer Appendix 1, Appendix 7.

**Question** E8

**Specific request** Please provide a description of the habitat immediately above the Coastal Marine Area (CMA), with an assessment against the criteria of a natural inland wetland (as set out in the NPS-FM).

**Applicant response provided by** Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 The CMA, in this area is defined in the AUP as the seaward side of Great North Road (ID: 159; NZTM Point X: 1751960.23, NZTM Point Y: 5917779.09).

- 2 The riparian area immediately above Great North Road is not consistent with the definition of a natural inland wetland in the NPS:FM (as of April 2023) as it would not meet the first criterion. The area is not a wetland (as defined in the Act). In this location Te Auaunga is well defined by the heavily incised stream bed/banks, with the stream approximately 2 m below the floodplain comprised of a similar vegetation community as of the rest of the riparian margin of Te Auaunga (a mixture of exotics in the tree canopy, and a native understory; ground cover is comprised heavy of leaf litter, alluvial deposits that are likely to have been deposited after recent heavy rainfall, ground cover vegetation where present was the exotic pest plant Hedera helix (Ivy) and Tradescantia.
- 3 The area is not a wetland. It is also noted that this area is outside of the plan change extent.
- 4 Refer Figure 3, Appendix 8.

**Question** E9

**Specific request** Please provide a map of the section of Wairaka Stream that has been / is proposed for daylighting.

Update Map in Appendix 1 of the Ecological Report accordingly.

**Applicant response provided by** Jason Smith – Morphum Environmental Limited

**Applicant response**

- 1 This was shown in the map provided as Appendix 1 of the original EclA. Please refer to Appendix 1 map of EclA.
- 2 Note that, as shown in Figure 4 in Appendix 9, a section of the daylighting has already occurred.
- 3 An updated stream length of potential daylighting opportunity is shown in Appendix 1. Approximately 2/3rds of daylighting remain.
- 4 Refer Appendix 1, Appendix 9.



**Appendix 1: Map**



Note: Trees not otherwise classified are individual mature specimen trees or have recently been removed.

Z:\Projects\Government\HUD\P02916 Carrington Plan Change\GIS\ArcPro\P02916\_arcpro Layout Carrington\_Precinct\_A3 Mar 23

- Rock Outcrop
- Vegetation Area**
- Exotic riparian vegetation (2,605 m<sup>2</sup>)
- Native riparian vegetation (3,085 m<sup>2</sup>)
- Mature mixed canopy (5,807 m<sup>2</sup>)
- Watercourses**
- Piped Section
- Wairaka Stream
- Stormwater Management Device
- Wairaka Precinct

Client: Ministry for Housing and Urban Development

Project: **TE AUAUNGA**



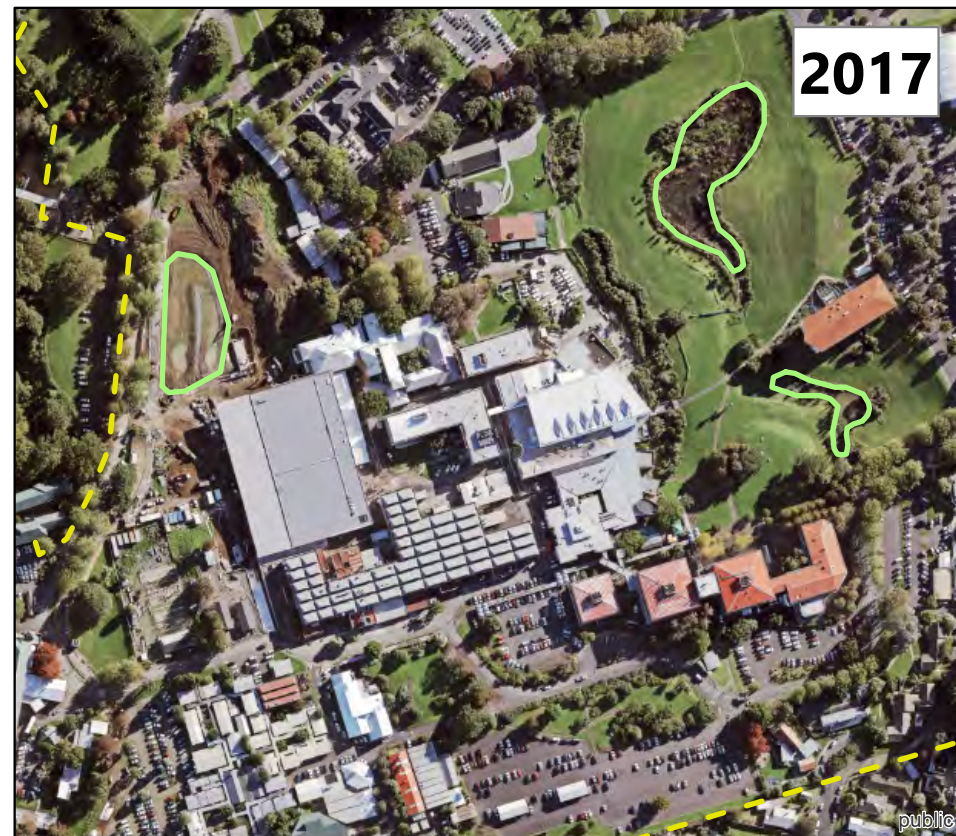
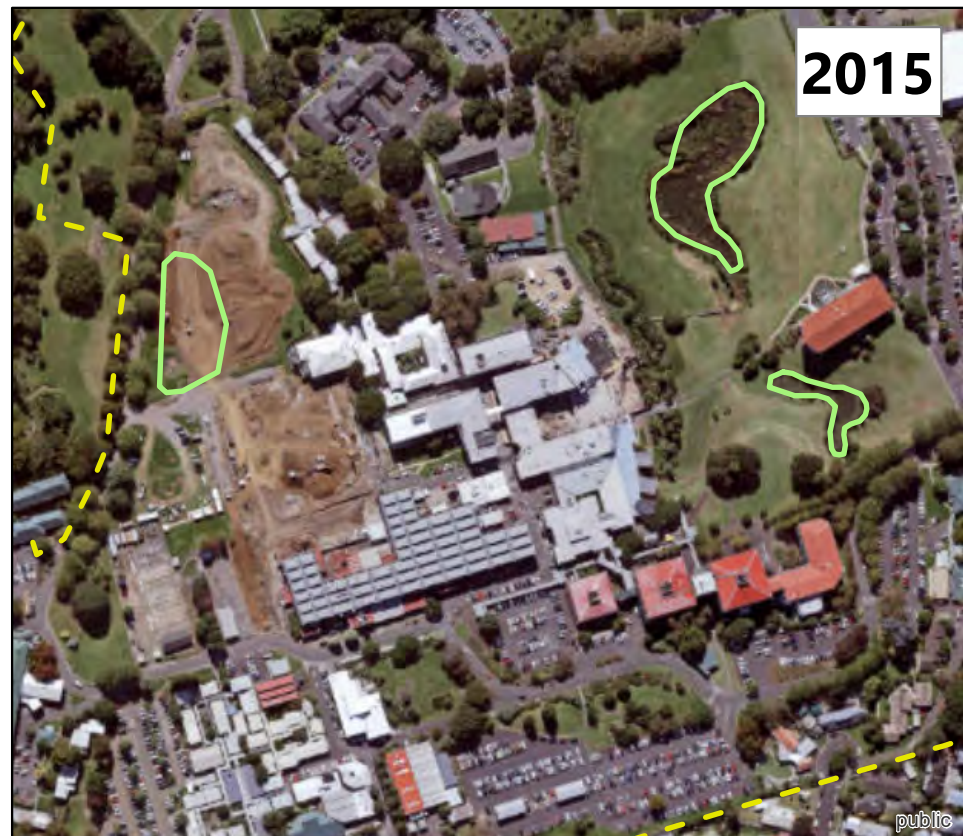
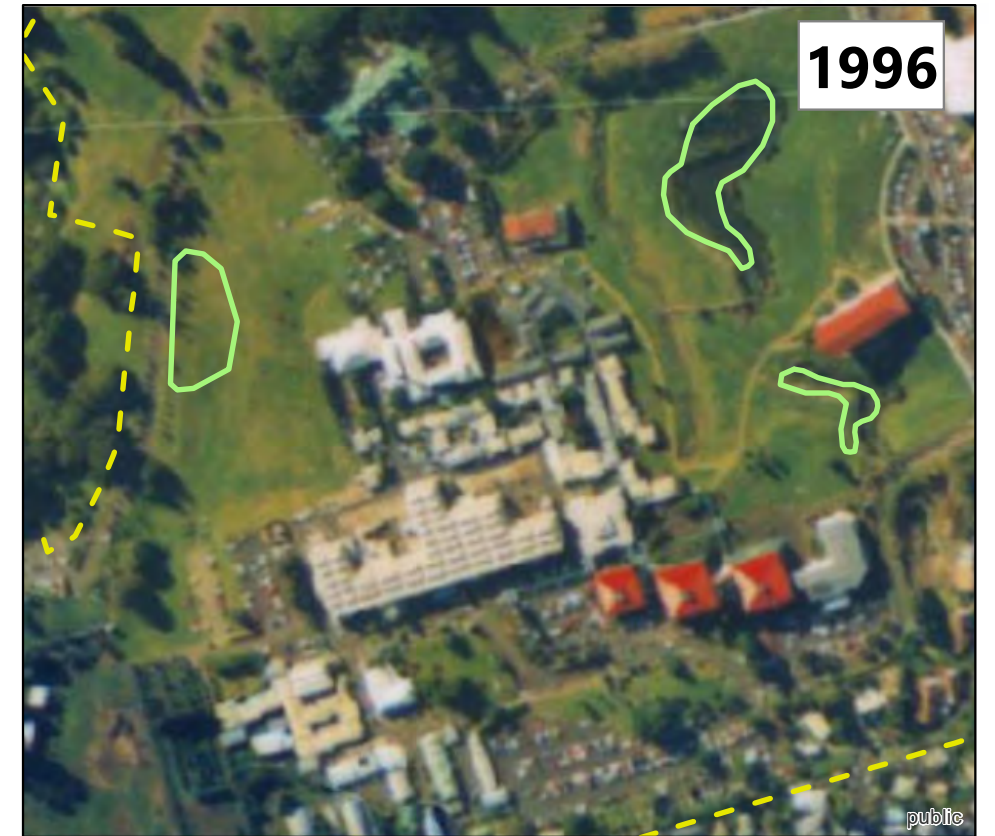
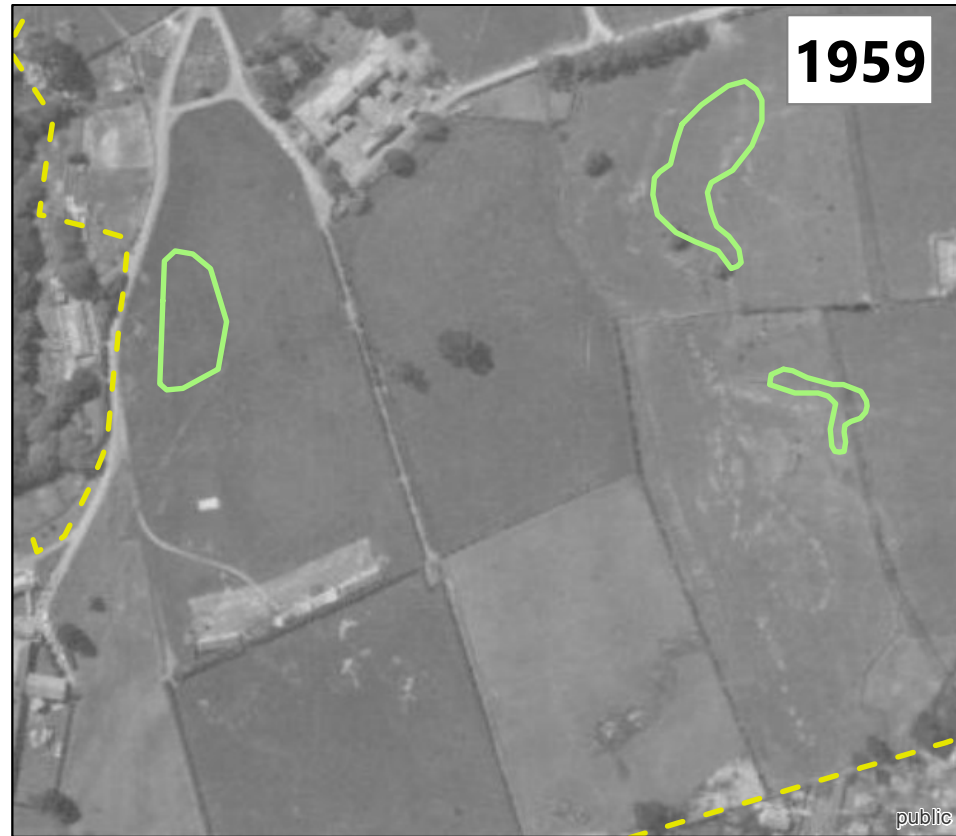
Project no. P02916  
Date 4 Apr 2023

Drawn CU  
Approved JS

This plan may contain errors or omissions or may not have the spatial accuracy required for some purposes. There may be other information relating to the area shown on this map which is unknown to Morphum Environmental Ltd. This map may contain Crown copyright data. Please consult Morphum Environmental Ltd if you have any queries.

**Appendix 2: Photo-schedule**

# HISTORIC IMAGERY SHOWING UNITEC WETLANDS



Z:\Projects\Government\HUD\P02916 Carrington Plan Change\GIS\MXD\016 Historical Aerials.mxd

2022 Imagery by Google Earth

- Wairaka Site Boundary
- 'Wetlands'

Client **MINISTRY FOR HOUSING AND URBAN DEVELOPMENT**  
 Project **TE AUAUNGA**

Project no. P02916  
 Date 3 Apr 2023  
 Drawn CU  
 Approved JS



This plan may contain errors or omissions or may not have the spatial accuracy required for some purposes. There may be other information relating to the area shown on this map which is unknown to Morphem Environmental Ltd. This map may contain Crown copyright data. Please consult Morphem Environmental Ltd if you have any queries.

**Appendix 3: Ecological Values Assessment**

Vegetation Type	EIANZ (2018) Assessment matter	Assessed value	Reasoning
Exotic riparian vegetation	Representativeness	Very Low	Vegetation with typical structure and composition that would be found in a community of exotic trees in urban Auckland. Exotic species dominate.
	Rarity/distinctiveness	Very Low	Common, exotic species commonly encountered in urban Auckland.
	Diversity and pattern	Very Low	A low species diversity of common exotic species
	Ecological context	Low	Although not of individual species merit, the riparian nature of this vegetation provides importance ecological service functions, albeit to a limited degree. Important functions include stepping stone for native fauna moving across the wider landscape and a degree of shade and overland filtration for the streams
	<b>Overall</b>	<b>Negligible</b>	
Native riparian vegetation	Representativeness	Low	Vegetation is not of the typical structure and composition that would be found in a natural vegetation community. Reflects the planted nature of this vegetation and commonality across urban Auckland.
	Rarity/distinctiveness	Moderate	As a myrtle, manuka threat status has been recently revised to 'At Risk', vegetation is not otherwise rare or distinct. Manuka/kanuka scrub has a regional IUCN threat status of least concern.
	Diversity and pattern	Low	Diversity is well below what would naturally have occurred in manuka/kanuka scrub historically and pattern is limited to a single ecotone along the riparian margin

Vegetation Type	EIANZ (2018) Assessment matter	Assessed value	Reasoning
	Ecological context	Moderate	The riparian nature of this vegetation provides importance ecological service functions, albeit to a limited degree. Important functions include stepping stone for native fauna moving across the wider landscape and a degree of shade and overland filtration for the watercourses. Value has increased to reflect the habitat provisioning and foraging opportunities for native fauna
	<b>Overall</b>	<b>Moderate</b>	
Mature mixed canopy	Representativeness	Very Low	The vegetation type here is not reflective of any natural vegetation community.
	Rarity/distinctiveness	Moderate	As a myrtle, pohutakawa threat status has been recently revised to 'At Risk'. The specific species assemblage is of species commonly found throughout Auckland, even in urban environs.
	Diversity and pattern	Very Low	The vegetation communities within the precinct are not considered to represent a natural diversity of species or habitat types.
	Ecological context	Low	The vegetation potentially provide foraging, nesting habitat functions, mainly for disturbance tolerant species, given proximity to road way.
	<b>Overall</b>	<b>Low</b>	

**Appendix 4: Bird Records**

Table 1: (31/03/2023)

<b>Common name</b>	<b>Scientific name</b>	<b>Threat Status (Robertson et al. 2016)</b>
<b>Species noted previously (2022)</b>		
Australian Magpie	<i>Gymnorhina tibicen</i>	Introduced and naturalised
Common Myna	<i>Acridotheres tristis</i>	Introduced and naturalised
Eurasian Blackbird	<i>Turdus merula</i>	Introduced and naturalised
House Sparrow	<i>Paser domesticus</i>	Introduced and naturalised
New Zealand Kingfisher	<i>Todiramphus sanctus vagans</i>	Not Threatened
North Island Fantail	<i>Rhipidura fuliginosa placabilis</i>	Not Threatened
Pukeko	<i>Porphyrio melanotus melanotus</i>	Not Threatened
Skylark	<i>Alauda arvensis</i>	Introduced and naturalised
Song Thrush	<i>Turdus philomelos</i>	Introduced and naturalised
Spur Wing Plover	<i>Vanellus miles</i>	Not Threatened
Welcome Swallow	<i>Hirundo neoxena neoxena</i>	Not Threatened
<b>Additional records (2023) – Within Wairaka Precinct</b>		
Silverye	<i>Zosterops lateralis lateralis</i>	Not Threatened
Tui	<i>Prosthemadera novaeseelandiae novaeseelandiae</i>	Not Threatened
Goldfinch	<i>Carduelis carduelis</i>	Introduced and Naturalised
Common pheasant	<i>Phasianus colchicus</i>	Introduced and Naturalised
Black-backed gull	<i>Larus dominicanus</i>	Threatened – Nationally Critical
Mallard	<i>Anas platyrhynchos</i>	Introduced and Naturalised
<b>Additional records (2023) – from outside Wairaka Precinct</b>		
Pied shag	<i>Phalacrocorax varius</i>	At Risk - Recovering
White faced heron	<i>Egretta novaehollandiae</i>	Not Threatened
South Island pied stilt	<i>Haematopus finschi</i>	Not Threatened
Red-billed gull	<i>Chroicocephalus novaehollandiae</i>	At- Risk
New Zealand Pigeon	<i>Hemiphaga novaeseelandiae</i>	Not Threatened
Pied stilt	<i>Himantopus leucocephalus</i>	Not Threatened
Little shag	<i>Microcarbo melanoleucos</i>	Not Threatened
*Bar-tailed godwit	<i>Limosa lapponica</i>	At Risk

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Buff-banded rail	<i>Gallirallus philippensis</i>	At Risk – Declining
*Variable oyster catcher	<i>Haematopus unicolor</i>	At Risk - Recovering
*Wrybill	<i>Anarhynchus frontalis</i>	Threatened - Nationally Vulnerable
Harrier hawk	<i>Circus approximans</i>	Not Threatened
Paradise duck	<i>Tadorna variegata</i>	Not Threatened
*Caspian tern	<i>Hydroprogne caspia</i>	Threatened - Nationally Vulnerable
Royal spoonbill	<i>Platalea regia</i>	At Risk – Naturally Uncommon
*White fronted tern	<i>Sterna striata</i>	Threatened – Naturally Critical
*Far eastern curlew	<i>Numenius madagascariensis</i>	Non-resident Native - Vagrant
*New Zealand dotterel	<i>Charadrius obscurus</i>	At Risk – Recovering
Black billed gull	<i>Chroicocephalus bulleri</i>	Threatened – Naturally Critical

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\*Denotes coastal species unlikely to be found in the plan change area.



Appendix 5: Actively managed vegetation



**Figure 1:** Pine that would otherwise be considered potential roosts, note scars that have healed over where lower vegetation has been removed.

Appendix 6: NRSI memo

## Notification determination and resource consent decision report for a discretionary activity under the Resource Management Act 1991

Subject: To authorise the damming of water with and use of an existing dam on the bed of a tributary of Oakley Creek, Mt Albert for stormwater treatment.

To: Greg Murphy, Team Leader: Water Allocation

From: Stephen Crane, Senior Consents & Compliance Advisor

Date: 12 August 2015

### 1.0 APPLICATION DESCRIPTION

#### Application and Property Details

Applicant Name: Unitec Institute of Technology

Consent Application Number: 33526

File Number: 8256

Activity: Discretionary

Site Address/Location: 1 Carrington Road, Mt Albert, Auckland

### 2.0 PROPOSAL, SITE AND LOCALITY DESCRIPTION

#### 2.1 Reason for application

Consent is required under the Proposed Auckland Unitary Plan (PAUP) rule H.4.17.1 and Rule 6.5.62 in the Auckland Council Regional Plan: Air Land and Water.

The dam does not comply with rules 6.5.52 and 6.5.56 because the catchment area is greater than 40 ha, and although the dam is a stormwater dam in an urban area, it is not required to meet the conditions of a consent to divert and discharge stormwater required under chapter 5 of this plan.

#### 2.2 Proposal and site description

The applicant owns a 51.5 ha property, on the west side of Carrington Road, Mt Albert. The applicant has made an application no. 33526 to replace existing consent no. 8256 (file Kr 928256) to dam water with a 5m high on-stream dam located on a

tributary of Oakley Creek, 530m upstream of the confluence with the main stem, granted in April 1992, and expiring on 31 December 2006. The dam is for a stormwater detention / quality pond and located on Lot 2 DP 406935 (CT 424414).

A full description of the proposal is provided in the application titled Application for Resource Consent to dam surface water, received 7 December 2006 prepared by Glenn Huggard (hereby referred to as the Application Report).

The existing dam has been in place since 1992 however consent for the damming of water expired in 2006. The dam was constructed for demonstration stormwater ponds. The embankment and spillway designs were developed following extensive hydrological analysis of present and future flood flow conditions. The design calculations by Beca Carter Hollings and Ferner dated March 1991 are held on file 8256. Also on file is the report "Maintenance Manual, Carrington Polytechnic Sediment Stormwater Ponds, August 1992" prepared by Beca Carter Hollings & Ferner Ltd.

The dam and impoundment has the following specifications:

The 5m high dam is well finished with a grassed embankment. The dam crest is approximately 3m in width at its maximum height of RL 20.6m. From this point the width of the downstream toe of the dam is approximately 47m to the invert of the downstream watercourse at RL 15.6m. The length of the dam crest is approximately 130m as measured along the length of the pond at its outlet end (eastern). The slope of the downstream embankment is 1V: 10H.

The invert of the 11m wide flood spillway is at RL 20.0m (600mm deep below the dam crest). The invert of the outlet weir to the 1050mm diameter service spillway pipe, and normal pond water level, is at RL 19.5m with 500mm freeboard.

There have been no changes to the dam since its construction in 1992. The original water permit however had calculated the dam height at 3.1m. This measurement was taken from the RL of the outlet pipe and not at the invert of the watercourse to which the pipe structure discharged into. As a result the height of the dam has been recalculated at 5m. The impoundment surface area is 5300 m<sup>2</sup> and the volume is 7500 m<sup>3</sup>. The catchment area is 42 ha.

The dam is located on-stream.

A site visit to the dam proposed location was completed by AC sediment control advisor Matt Byrne On 20 July 2009.

### **2.3 Catchment description**

The Oakley Creek catchment is in the AC Waitemata surface water management area. The AC has no surface water allocation management plan for this management area of stream catchments. No minimum flow or water availability for this stream

catchment, or any other stream catchment in the Auckland region, has been set in the Auckland Council Regional Plan: Air, Land and Water 2010.

The Oakley Creek catchment is one of several stream catchments which discharge into the Waitemata Harbour. The Oakley Creek catchment rises to an elevation of 100m at the Hillsborough Road ridge. The western area of the Oakley Creek catchment is comprised of Waitemata Group sandstone while the catchment to the NE of the creek is dominated by basaltic lava flow derived from Mt Albert. The interface of the two lithology generally forms the Oakley Creek stream channel.

All building on the Unitec campus have numbers. The dammed watercourse (with no official stream number) flows northward under the campus Farm Road and to the west of the sports fields, is piped for 100m between buildings 033 and 035, flows through the separate Mason Clinic property of Waitemata Health Ltd, and discharges into the main stem of Oakley Creek at map reference NZTM 1751955mE 5917570mN. The stream is not denoted as Natural Stream Management Area in chapter 3 and maps of the Auckland Council Regional Plan (Air, Land and Water).

The dam impounds the lower of two stormwater detention and quality ponds located on the Unitec campus. The campus site is comprised of office buildings with classrooms with car parks, sports fields and meeting houses / buildings located across the campus. The immediate area surrounding the two ponds is currently moderately sloped banks which are grassed while the ponds themselves have a healthy abundance of native vegetation normally associated with stormwater ponds and wetlands.

The catchment above the ponds is comprised of a residential area of Mt Albert running back up to New North Road at 50m above msl. Piped stormwater from parts of this area is reticulated and discharged at the head of the ponds. Additional stormwater from the surrounding campus roads, buildings and pervious areas also contribute to pond flows.

The area of the catchment where the dam and stormwater ponds were constructed comprises basalt overlain by alluvium. Alluvial material from the stream channel was removed prior to construction of the dam.

The dam discharges water to the remaining stream channel which, when studied during the site visit, was approximately 1m wide with an average depth of 0.3m. Flows observed during the site visit 20 July 2009 were abundant with the visual colour and clarity of the stream appearing good. The stream from the discharge point of the dam meanders through the campus and is occasionally piped beneath road crossings and campus buildings. Its length from the dam to the receiving environment of Oakley Creek is approximately 530m.

There is another small unnamed stream (also with no official stream number), flowing through a small part of the Unitec campus, that arises at a spring known as Te Wai Unuroa o Wairaka (The long drink of Wairaka) located at map reference NZTM

1752255mE 5917000mN adjacent to Building #180. The spring fed stream discharges into the dammed stream about 200m downstream of the spring source.

**Fig 1 Oakley Creek and Dam site**



The Unitec e-Learning site provides the following information about the spring which is of significance to iwi: “The numerous subterranean streams and tunnels around the Mt Albert region and extending to Riu ki Uta (Three Kings) was known as the Ara Tomo O Ruarangi (tunnel entrance of Ruarangi) and was used extensively by a people known as Turehu (a supposed light skinned race who came early to Aotearoa) or Patupaiarehe to escape from their enemies.

When Mataatua canoe made its way north from Whakatane with Puhi in command, they made landfall near the Whau River. With him was his younger brother, priestly sister Muriwai and niece Wairaka. Wairaka was already famous when she acted

quickly and saved the Mataatua canoe from the rocks at the mouth of the Whakatane River. Before swimming out to the canoe, she uttered the statement Kia whakatane au i ahau (let me act like a man) hence the name, Whakatane. Wairaka's home here was Te Pou of Wairaka, now known as Owairaka or Mt Albert. Wairaka's people stayed on here and intermarried with the people of Rakataura (Tainui) and Ohomairangi (Te Arawa).

Springs surfaced everywhere around Mt Albert, including the spring that gushes out on campus. When Wairaka was thirsty, she demanded water and stamped her foot on the ground. Fresh water gushed out of the ground. This spring is known as Te Wai Unuroa o Wairaka (The long drink of Wairaka). Some iwi refer to Rakataura as being the rangatira who led the 'Turehu' people at the time, whilst others refer to Ruarangi. Regarding nga wai unuroa o Wairaka (the long drink of Wairaka) – the ancestress from Ngati Awa, some iwi refer to Nga wai o Raka-taura (the waters of Rakataura).

The spring here on campus was highly valued for drinking and for the rituals of thanks-giving and ceremonials. It offered relief to the sick, as well as for healing, bathing, irrigation and was a constant provider of food. To locate the spring follow the stream past the Marae, Puukenga, and Red Lecture Theatre. The spring lies just past the bridge that spans the stream”.

### Stream flows

Stream minimum flows, dam bypass flows, and water availability are commonly expressed in terms of the stream mean annual low flow (MALF or  $Q_{2.3}$ ). This is the flow that the stream would naturally recess to on average only once every 2.3 years. It is calculated from an analysis of continuous long term flow records at a site, often measured with a weir. The MALF and other flow statistics in stream catchments with few flow records can be assessed from comparison with other catchments that do have such long flow records. The specific discharge (SD) is the flow per unit area of catchment expressed in litres per second per square kilometre ( $l/s/km^2$ ). It can be used to predict flows in other stream catchments.

There is no regular summer manual flow gauging site on the stream that runs through the Unitec campus site. Determining a MALF for the stream requires reference to records from other streams. Stream flow specific discharges tend to reflect the underlying geology. The surface geology of the dam catchment comprises Mt Albert basalt flows. On the main stem of Oakley Creek there is the AC Oakley Creek @ Richardson Rd continuous flow measuring site with a catchment area of  $6.2 km^2$ . The site was installed in September 2012. With such a short flow record it is not possible to calculate an accurate MALF from the record.

There is also a flow site Meola @ Motions Rd on the adjacent Meola Creek with a catchment area of  $12.9 km^2$ . The MALF for this site is 41 l/s and MALF specific discharge  $SD_{2.3}$   $3.2 l/s/km^2$ . The flow at this site recessed to the MALF about 18 to 24 February and 6 to 14 March 2014. The concurrent flow at AC Oakley Creek @ Richardson Rd site in these periods was about 25 l/s. This suggests that the MALF

for this site is about 25 l/s and MALF specific discharge  $SD_{2,3}$  for the 6.2 km<sup>2</sup> catchment area is 4 l/s/km<sup>2</sup>.

There will be infiltration from the basalt geology catchment into the stormwater pipes upstream of the applicant's dam in summer conditions. The catchment area at the applicant's dam site is 0.42 km<sup>2</sup>, and the natural mean annual low flow, based on a specific discharge of 4 l/s/km<sup>2</sup>, is therefore estimated as 1.7 l/s.

## 2.4 Background

In 1992, the Auckland Regional Council (ARC) granted consent for a Water Permit to Carrington Polytechnic (Unitec Institute of Technology) to dam an unnamed tributary of the Oakley Creek, Mt Albert. The purpose of the water permit was to create a dam associated with the creation of two stormwater quality / detention ponds at the Carrington Polytechnic campus. This water permit expired on 31 December 2006. Associated consents are stormwater discharge no. 8257 (file Br 928246) and streamworks no. 28690 (file Lu 17268).

In August 2006, Unitec applied for a replacement consent to authorise the existing dam. After a lengthy correspondence period, a site visit was undertaken by representatives of the then ARC on 20 July 2009, in order to assess the existing stormwater ponds and the dam structure. Further assessment of an associated stormwater discharge permit no.8257 (file 928246) which expires 31 December 2027, was also undertaken in order to assess the appropriateness of granting a replacement consent for the existing damming of water.

A comprehensive stormwater discharge consent no. 24973 (file 10752) was granted in June 2001 for the whole Oakley Creek catchment, and expires December 2032.

## 2.5 Other activities considered

There are no other activities being considered with this application.

## 3.0 NOTIFICATION ASSESSMENT

### 3.1 Assessment of permitted baseline

The permitted baseline only applies to permitted activities on the subject site. If the baseline is applied, then the relevant permitted baseline is ACRP:ALW Rule 6.5.52 "The damming of water with an existing dam as at 23 October 2001 on the bed of a permanent stream subject to conditions including that the dam structure shall be no greater than 4m in height and catchment no greater than 40 ha".

This constitutes the permitted baseline and these adverse effects may be discounted as the level of adverse effect arising from those permitted activities has been deemed to be acceptable. It is only any other or further adverse effects arising from the proposal over and above the permitted baseline which are to be assessed.



The dam has a catchment area of 42 ha and crest height of 5 m, and is therefore greater than the permitted activity. Most water in a dam is held in the top 1-2m. Due to the potential of this dam impoundment to hold a substantially greater amount of water, and the potential complexity of effects associated with the proposed activity, the permitted baseline does not provide a useful comparison for the purpose of discounting effects.

### **3.2 Assessment of effects on the environment Section 95(2)(a)**

The following assessment of the adverse effects of the activity on the environment addresses the activity's actual and potential effects, and any mitigating factors. Where appropriate the assessment criteria of the Auckland Council Regional Plan: Air, Land, Water (ACRP:ALW) policy 6.4.42 and 6.4.45 regarding damming water are used as the context for assessing the potential adverse environmental effects arising from the proposal. The stream at the dam location has permanent flow and so the dam is an on-stream dam.

#### Values of Oakley Creek

In terms of chapters 2 and 3 of the ACRP:ALW values and management Areas, the Oakley Creek stream does not have any Wetland management areas; and is not a Natural Stream, Water Supply or High Use Stream Management Area. It is an Urban Stream management area.

#### Effects on fish passage

Dams pose barriers that can prevent fish from accessing habitat necessary for specific life-cycle stages.

There is currently poor fish passage into the ponds as there is a vertical concrete wall constructed as part of the pond's outlet structure. It is expected however that limited fish passage is available to some native climbing species since fish passage from Oakley Creek to the discharge outlet of the pond appears suitable.

Fish passage on this dam is not required since, although there is a large catchment, there is no length of permanent stream upstream of the dam impoundment. There is no habitat upstream of the dam because it is fed by reticulated stormwater. A stormwater pipe discharges just upstream of the dam. While the dam impoundment is poor quality fish habitat, the stream downstream would provide better habitat.

#### Effects on stream flows, habitat and water quality

Damming water can reduce water levels and change flow regimes (including the natural flow variability) downstream. These changes can result in: an increase in the frequency and duration of low flows; poorer water quality including decreased dissolved oxygen concentrations and increased stream water temperatures; and a

reduction in available in-stream habitat, including that attributable to the drowning or inundation of the section of stream behind the dam.

Passing of low flows is required due to the moderate habitat quality of the main stem of Oakley creek. Based on the 42 ha dam catchment area, and a mean annual low flow specific discharge for the Oakley Creek catchment of 4 l/s/km<sup>2</sup>, the mean annual low flow is therefore estimated as 1.7 l/s.

No water is taken from the dam, and so maintaining the service spillway will suffice for passing low flows, since water that flows into the impoundment also flows out and downstream less any evaporation and seepage loss. There are no surface water take consents or other dams in the stream catchment.

Therefore a bypass flow of all natural inflow is required. This may be achieved by flow through the service spillway.

The dam has been in existence for approximately 21 years and the current wetland plantings that occupy the margins of the stormwater quality / detention pond provide adequate shading. The dam's margins wide sward of native plants adds to the visual amenity of the property, as well as providing habitat for bird life. It is considered that the dam does not create a negative impact on the surrounding properties amenity values.

#### Effects on dam safety, flooding, erosion and drainage

The damming of water carries with it a risk that the dam will fail, with potential damage to the downstream environment, including freshwater ecosystems, property, people, communities and infrastructure. The maintenance and enforcement of standards on dam design, construction, operation and maintenance will reduce the risk of dam failure. The dam hazard category was determined using the Dam Safety Guidelines (TP109, ARC, 2000). The ARC dam hazard category is "Low". Monitoring and management of the dam structure will avoid any effects of the dam caused by potential structural failure.

The applicant has provided details of the monitoring and maintenance program that is regularly carried out on the dam. Provided this monitoring and maintenance program continues to be administered, no further measures to avoid, remedy or mitigate adverse effects are considered necessary.

There are no downstream wetlands to be affected. The watercourse downstream of the dam to Oakley Creek is almost wholly contained on the Applicants property. The dam is fed by reticulated stormwater from the contributing catchment. There is no open stream above the dam. Overflow travels downstream through an unnamed tributary of the Oakley Creek for approximately 530m before discharging into the main stem (stream no. 081200) of the Oakley Creek at the property boundary.

A visual inspection of the downstream environment was undertaken on 20 July 2009 and at that time no adverse effects on the stream channel as a result of the dam were

noted. The damming of surface water within the pond attenuates upstream flows and provides regularly managed flows into the stream channel below the dam. The outflow from the dam discharges via a 1050mm diameter culvert onto a concrete apron and rip rap. Based on visual observation of the channel downstream of the dam, it is considered that the present scenario does not result in channel geomorphology effects that are more than minor.

### **Conclusion**

With regard to the above criteria, consideration must be given to the fact that the existing dam has been in place for 21 years. A healthy margin of native riparian vegetation has established along the banks of the dam's associated stormwater pond and wetland type plants have also established within the ponds. The stormwater ponds attenuate up-catchment flows and when available, provide for continuous flows to the downstream environment. While fish passage is not ideal, some passage is available, albeit limited to climbing species. Furthermore, given the dam's existing state, it is not considered practicable to include any requirements for installation of a low flow by-pass structure, to require decommissioning or removal of the dam, to require any financial contributions or to require any other mitigation measures.

The current application for a replacement consent does not propose to alter in any way the dam, its associated structures or the stormwater quality / detention ponds.

It is considered that any actual or potential adverse effects of the proposed activity on the environment as identified above will be less than minor. This conclusion is based on undertaking the proposed measures to ensure that the dam operation meets current standards for dam safety, and passing of low flows is implemented, to avoid, remedy or mitigate potential effects in accordance with the application documents and subject to adherence with the recommended conditions of consent.

### **3.3 Request or rule: Sections 95A to 95E**

Pursuant to Section 95A(2)(b), (c), and (3)(a), the applicant has not requested public notification and no National Environmental Standard or rule in the Regional Plan requires or precludes public or limited notification.

Pursuant to Section 95A(4) there are no special circumstances to warrant public notification.

Pursuant to Section 95C(2) and (3) further information as requested was provided by the set deadline, and a report was not commissioned.

### **3.4 Identification of affected parties**

Pursuant to section 95E it is determined that no other persons are considered adversely affected by the activity.

There is a small unnamed stream (also with no official stream number), flowing through a small part of the Unitec campus, that arises at a spring known as Te Wai Unuroa o Wairaka. The spring is of significance to iwi. The dam is not located on, and will not affect this spring-fed tributary.

A low flow bypass condition is included to ensure that the damming does not cause cumulative effects on the receiving environment.

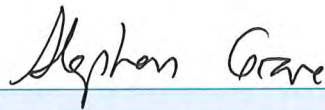
The stream discharges into the flat floodplain of an open grassed park-like grounds of the Unitec campus, immediately downstream of the dam on the applicant's own property. There are no buildings or structures in this immediate area, other than those of the applicant. The property of Waitemata Health Ltd is 400m downstream of the dam. No other person will be adversely affected by the application to dam water with the on-stream dam. Therefore written approvals were not required from any person by the Council.

### 3.5 Recommendation on notification

It is recommended that this application be processed on a non-notified basis because:

- The adverse effects on the environment of the activity for which consent is sought will be no more than minor.
- There are no persons considered adversely affected by the granting of this consent.
- The applicant has not requested public notification and no National Environmental Standard or rule in the Regional Plan requires public or limited notification.

Stephen Crane



**Senior Consents and Compliance Advisor, Natural Resources and Specialist Input, Resource Consents.**

Date:

12/8/2015

### 3.6 Notification determination

Acting under delegated authority, and for the reasons set out in the above assessment and recommendation, this application shall be processed on a non-notified basis.

Andrew Benson

AP Benson

**Team Manager: Water  
Natural Resources and Specialist Input, Resource Consents**

Date:

13 / 8 / 15

## 4.0 ASSESSMENT OF APPLICATION

### 4.1 Assessment of effects on the environment: Section 104(1)(a)

The assessment of adverse effects undertaken for the purpose of the notification decision concluded that adverse effects were no more than minor. That assessment is also relevant for the purpose of the assessment required under s104(1)(a). In addition the following positive environmental effects have been identified: the damming of water provides stormwater treatment for the applicant's property and upstream.

### 4.2 Statutory considerations: Section 104(1)(b)

#### **Auckland Council Regional Plan : Air Land and Water**

The following objectives and policies of the Auckland Council Regional Plan (Air, Land and Water) are considered relevant to the damming of water: 6.3.2, 6.3.5, 6.3.7, 6.4.1, 6.4.2, 6.4.40, 6.4.42, 6.4.45, and 6.4.47.

#### Comments

With adequate mitigation the proposal will not have more than minor adverse effects on the environment. Policy 6.4.42 and 6.4.45 sets out appropriate mitigation for damming proposals. In this case, passing of low flows, and dam maintenance measures are considered as appropriate required mitigation. Financial contributions and further wetland creation are not considered appropriate in this case. Dam removal is not considered necessary.

The proposal is consistent with maintaining the stream natural values. The effects of the dam on fish passage upstream are minor because, although there is a large catchment, there is no length of permanent stream upstream of the dam impoundment. There is no habitat upstream of the dam because it is fed by reticulated stormwater. A stormwater pipe discharges just upstream of the dam.

The dam was specifically designed for a stormwater detention / quality pond, and will therefore enhance the water quality in the Oakley Creek stream.

Sufficient flow will be passed down the service spillway pipe to attract and allow passage of fish up into the dam impoundment. The dam is designed to improve

rather than reduce water quality down-stream of the dam. It is not proposed that there be new tall riparian vegetation on the stream downstream of the dam since that would not be consistent with the open grassed park-like grounds of the Unitec campus.

Maintenance of downstream flow regimes will be provided for, due to the consent condition requirement to pass low flows through the service spillway pipe, and that no water is being taken from the dam. There are no downstream lawful water users to be adversely affected.

It is therefore considered that there is no unmitigated impact on the natural character of the environment or effects on flora and fauna. The proposal is consistent with Tangata Whenua values identified in the Regional Plan.

One of the matters that applications for damming shall be assessed against (policy 6.4.42 (f) and 6.4.45(d)) is remedial measures and ongoing operation and maintenance to ensure those dams' safety performance standards are being met. The dam structure has been inspected by engineers who report that the dam overall hazard rating is low. No dam remediation (repairs) are required, although ongoing maintenance and monitoring are required by the recommended consent conditions 8 to 12 to minimise the potential for the dam to be a safety concern.

The recommended monitoring is consistent with the hazard rating for the dam. Flooding as a result of the structure is not considered to be an issue. Bed aggradation or impeded drainage on adjacent properties is unlikely. This dam application is being considered individually, since there are no cumulative effects of other existing dams in the catchment.

Land instability/bank erosion is not a concern. The dam is not expected to have effects more than minor on hydrological flows or water quality, subject to implementing mitigation. Therefore there would be no more than minor adverse effect on people, communities or habitat. No wetlands have been identified in the vicinity of the dam. A review condition is recommended in line with policy 6.4.44.

There were no adverse effects on any wetland, wāhi tapu or archaeological site.

It is concluded that the proposed activity is consistent with the provisions of the ACRP: ALW, subject to compliance with the recommended conditions of consent. In particular it is noted that the dam design, construction, operation and maintenance, has been addressed through conditions. Sufficient water will be retained in the natural water body to protect instream values, tangata whenua traditions (e.g. mahinga kai) and natural character and amenity values.

### **Consideration of the provisions of the Proposed Auckland Unitary Plan (PAUP)**

For the damming of surface water and use of a dam on the bed of rivers and streams, the relevant objectives and policies of the Proposed Auckland Unitary Plan

(PAUP) are contained in Part 2, Chapter C, Sub section 5.15.2 – Water quantity, allocation and use, Policies 11 to 16; Part 2 Chapter E Sub section 7.3 - Overlay objectives and policies High Use Stream and Natural Stream Management Areas, and Part 5 Appendix 5.2 Table 1 River and stream minimum flow and availability. The relevant regional rules are contained in Part 3 Chapter H: Natural Resources sub section 4.17- Taking, using, damming and diversion of water and drilling.

In summary, the intent of the policies of the PAUP is quite similar to those of the ACRP: ALW.

Overall, I have applied greater weight to the operative plan provisions in my assessment.

### **Other statutory documents**

An assessment has been undertaken of the proposed activity against the relevant provisions of the:

- National Environmental Standard
- National Policy Statement: *Freshwater Management 2011*
- Auckland Council Regional Policy Statement
- Proposed Auckland Unitary Plan.

It is concluded that the proposed activity is consistent with the relevant provisions of the plans and policy statements, subject to compliance with the recommended conditions of consent.

### **4.3 Other relevant matters: Section 104(1)(c)**

There are no other matters considered relevant and reasonably necessary to determine the application.

### **4.4 Consideration of Part 2 matters**

Policy to address the potential adverse effects of damming water on a permanent stream have been set in the ACRP: ALW. Consultation was undertaken with Iwi in the development of this Plan. As the proposed mitigation is consistent with the Plan policy, it is concluded that the proposal will not adversely affect matters of national importance, including the relationship of Maori with the water resources under s 6(e).

As the adverse effects of the proposed activity on the environment can be satisfactorily avoided, remedied or mitigated, and as the proposal is consistent with and not contrary to the statutory direction, it is concluded the proposal meets the purpose and principles of the RMA and is a sustainable use, development and protection of natural and physical resources, in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing

and their health and safety while -

- a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Having considered the Matters of national importance, Other matters, and the requirement to take into account the principles of the Treaty of Waitangi, it is concluded that the proposal will not adversely affect any of those matters.

#### **4.5 Duration of consent: Section 123**

Policy 6.4.13 of the ACRP: ALW provides for the setting of concurrent duration and review dates of consents within a catchment or aquifer, to allow management of water damming, takes and discharges in an integrated manner. The applicant did not apply for a specific duration of consent.

Most of the related water take consents in the same AC Auckland Isthmus surface water management area expire in 2021 and will likely be replaced with a term of 15 years to expire in 2036. It is considered appropriate to set a term of 21 years for this consent so that the expiry date will be consistent with the future 2036 expiry date of other surface water consents in the same management area.

A term of 21 years is considered an appropriate balance between the likelihood of change in the activity and water requirements over the term of consent, and the need to provide security of tenure to reflect investment in infrastructure.

The consent will therefore expire on 31 May 2036 with provision to review the conditions in June 2016 and at not less than five yearly intervals thereafter. This recommendation is made in accordance with policy 6.4.13 of the ACRP: ALW. The review condition allows the AC to take into account a range of information, including results of previous monitoring and changed environmental knowledge, in determining whether or not the conditions of consent should be changed.

## **5.0 RECOMMENDATION**

### **5.1 Adequacy of information:**

The above assessment is based on the information submitted as part of the application. It is considered that the information submitted is sufficiently comprehensive to enable the consideration of the above matters on an informed basis:



- a. The level of information provides a reasonable understanding of the nature and scope of the proposed activity as it relates to the relevant district and/or regional plan.
- b. The extent and scale of any adverse effects on the environment are able to be assessed.
- c. Persons who may be adversely affected are able to be identified.

## 5.2 Recommendation

It is recommended that pursuant to Sections 104, 104B, and 108 of the RMA, consent is granted to the discretionary activity application by Unitec Institute of Technology to dam water with and use an existing dam on the bed of a tributary of Oakley Creek, Mt Albert for stormwater treatment at 1 Carrington Road, Mt Albert, Auckland being consent application 33526.

The reasons for this decision are as follows:

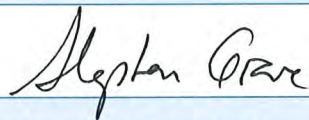
1. It is considered that the overall adverse effects on the receiving environment are no more than minor. Subject to the imposition of conditions, the effects can be further avoided, remedied or mitigated.
2. The proposal is considered to be consistent with the relevant provisions of the NES, Regulations, NPS, ACRPS, ACRP:ALW, PAUP, and in particular, the integrated management of the Region's natural and physical resources.
3. The proposal will be consistent with Part 2 of the Resource Management Act 1991 by promoting the sustainable management of natural and physical resources. Overall it is considered that the cumulative safeguards of Section 5(2)(a) to (c) have been met and the proposal thereby meets the purpose of the RMA.

## 5.3 Conditions

Recommended conditions of consent are provided following the draft Reason for decision.

## 5.4 Report by:

Stephen Crane



**Senior Consents and Compliance Advisor, Natural Resources and Specialist Input, Resource Consents.**

Date:

12/3/2015

**RESOURCE CONSENT 33526 SECTION 104 AND 108 DECISION**

**Application Description**

Consent to dam water

**Application and Property Details**

Consent Holder: Unitec Institute of Technology

Consent Application Number: 33526

File Number: 8256

Site Address: 1 Carrington Road, Mt Albert, Auckland

Legal Description: Lot 2 DP 406935

**DECISION UNDER DELEGATED AUTHORITY**

Acting under delegated authority pursuant to Sections 104, 104B and 108 of the RMA, consent is granted to the discretionary activity application by Unitec Institute of Technology to dam water with and use an existing dam on the bed of a tributary of Oakley Creek, Mt Albert for stormwater treatment.

**Signed under Delegated Authority**

Andrew Benson



**Team Manager: Water  
Natural Resources and Specialist Input, Resource Consents**

Date:

13/8/15

**Reasons for this decision**

The reasons for this decision are as follows:

1. It is considered that the overall adverse effects on the receiving environment are no more than minor. Subject to the imposition of conditions, the effects can be further avoided, remedied or mitigated.
2. The proposal is considered to be consistent with the relevant provisions of the NES, Regulations, NPS, ARPS, ACRP: ALW, PAUP, and in particular, the integrated management of the Region's natural and physical resources.
3. The proposal will be consistent with Part 2 of the Resource Management Act 1991 by promoting the sustainable management of natural and physical resources. Overall it is considered that the cumulative safeguards of Section 5(2)(a) to (c) have been met and the proposal thereby meets the purpose of the RMA.

## CONDITIONS

Pursuant to Section 108 of the RMA, this consent shall be subject to the following conditions:

### General conditions

#### **Activity in accordance with plans**

1. The damming of water with and use of an existing dam on the bed of a tributary of Oakley Creek, Mt Albert on land legally described as Lot 2 DP 406935 (C.T. 414414) for stormwater treatment shall be carried out in accordance with the plans and all information submitted with the application, detailed below and all referenced by Council as Resource Consent Application 33526.

#### **All charges paid**

2. This consent (or any part thereof) shall not commence until such time as the following charges, which are owing at the time the Council's decision is notified, have been paid in full:
  - (a) All fixed charges relating to the receiving, processing and granting of this resource consent under section 36(1) of the Resource Management Act 1991 (RMA); and
  - (b) All additional charges imposed under section 36(3) of the RMA to enable the Council to recover its actual and reasonable costs in respect of this application, which are beyond challenge.
3. The consent holder shall pay any subsequent further charges imposed under section 36 of the RMA relating to the receiving, processing and granting of this resource consent within 20 days of receipt of notification of a requirement to pay the same, provided that, in the case of any additional charges under section 36(3) of the RMA that are subject to challenge, the consent holder shall pay such amount as is determined by that process to be due and owing, within 20 days of receipt of the relevant decision.
4. The consent holder shall pay the council any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to this consent/s.

#### Advice Note:

The initial monitoring charge is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc., all being work to ensure compliance with the resource consent. In order to recover actual and reasonable costs, inspections, in excess of those covered by the base fee paid, shall be charged at the relevant hourly rate applicable at the time. The consent holder will be advised of the

further monitoring charge or charges as they fall due. Such further charges are to be paid within one month of the date of invoice. Only after all conditions of the resource consent have been met, will the council issue a letter confirming compliance on request of the consent holder.

### **Access to property**

5. That the servants or agents of the Council shall be permitted access to the relevant parts of the property at all reasonable times for the purpose of carrying out inspections, surveys, investigations, tests, measurements or taking samples.

### **Specific conditions dam water consent 33526**

#### **Term of consent / duration**

6. The damming of water permit 33526 shall expire on 31 May 2036 unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

#### **Works**

7. The dam shall be constructed and maintained in accordance with the following dimensions and standards:
  - A 5 metre high earth fill dam, crest length 130 metres, crest width 3 metres.
  - A maximum impoundment surface area of 5300 square metres and approximate impoundment volume of 7500 cubic metres.
  - Flood spillway trapezoidal shape 11 metres wide base and 0.60 metres freeboard below dam crest.
  - A flood spillway capable of safely passing a 1% Annual Exceedance Probability (AEP) flood flow with minimal damage to the flood spillway.

#### **Significant remedial works**

8. In the event of any significant remedial works being required as a result of damage or safety improvements to the dam, spillways, low flow bypass or fish passage, then works shall be completed as soon as possible. Within 20 working days of completion of the remedial works a certificate from a suitably qualified engineering professional shall be supplied to the Team Leader Consents and Compliance – Water Allocation certifying that the engineer has supervised the remedial works, that the works have been satisfactorily completed and that the design intent of the remedial works have been met.

Advice Note:

*Other consents such as stream works consents may be required before any remedial works can be undertaken. In addition, there may be other regional or district plan provisions that may apply – for example sediment control measures in the Proposed Auckland Unitary Plan and Regional Plan: Sediment Control. It is the Consent*

*Holder's responsibility to determine what other consents are required and to obtain these before undertaking any works.*

### **Passing of Low Flows**

9. All natural dam inflow shall be passed downstream of the dam at all times.

### **Dam safety and maintenance**

10. The dam, spillways, low flow bypass and associated structures shall be operated and maintained to ensure that, at all times, they are structurally sound, pose no undue risk to human life, property, or the natural environment, and are able to perform satisfactorily to their approved design standard.

#### **Advice Note:**

*Tasks associated with the maintenance of the dam include those necessary to minimise damage (including wave lap, vegetation and stock management), scour, and erosion along with any structural maintenance of the dam and associated facilities. Trees or large vegetation can weaken the structural stability of the dam, create seepage pathways and impede visual inspection and hence should not be allowed to grow on the dam. If the crest of the dam is to be used as a stock race, then the dam will need protecting with suitable measures such as covering the crest of the dam with gravel, fencing the sides of the crest, and diverting stormwater away from the upstream and downstream dam faces.*

### **Dam Inspection**

11. The dam, spillway, low flow bypass and associated structures shall be inspected at six monthly intervals and during/after extreme weather events in accordance with the "Maintenance Manual, Carrington Polytechnic Sediment Ponds, prepared by BCH&F Ltd, August 1992" and Check Sheet appended to that manual.

#### **Advice Note:**

*A sample inspection sheet is attached in Appendix 1 of this consent to provide guidance to the Consent Holder as to the type of matters that should be addressed when an inspection is carried out. Inspections by a suitably qualified engineering professional should be undertaken if there are any significant changes to the dam, spillways, low flow bypass or associated structures.*

### **Professional Dam Inspection**

12. The dam, spillway, low flow bypass and associated structures shall be inspected by a suitably qualified engineering professional in 2020 and 2030 to check the structural integrity and functioning of the dam and associated structures, and to advise on any upgrade or maintenance works that are required. A copy of the inspection report is to

be provided to the Team Leader Consents and Compliance Water Allocation within 30 days of the inspection.

### Five Yearly Report

13. A report (including photographs) shall be submitted to the Team Leader Consents and Compliance Water Allocation by 30 June 2020 and subsequently at intervals of not more than five years thereafter. The report shall contain: Inspection records of the dam, low flow pass and other associated structures; Any maintenance works carried out during the previous five years and plans for any future works.

### Review

14. Pursuant to Section 128 of the RMA, the conditions of this consent may be reviewed by the Team Leader at the Consent Holder's cost:
- (a) In June 2016 and subsequently at intervals of not less than five years thereafter in order to:
    - (i) deal with any adverse effect on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage or
    - (ii) vary the operating, monitoring and reporting requirements, mitigation measures and performance standards in order to take account of information, including the results of previous monitoring and changed environmental knowledge, on: water flow and level regimes, including bypass flow requirements; water quality; instream biota, including the functioning of aquatic ecosystems and fish passage; dam safety performance;
  - (b) In the case of a coastal, water or discharge permit, to provide compliance with rules in any regional plan relating to use of water, water or air quality etc. (refer section 128(1)(b) of the RMA) that have been made operative since the commencement of consent.
  - (c) In the case of a coastal, water or discharge permit, to provide compliance with any relevant National Environmental Standard that has been made since the commencement of consent.
  - (d) At any time, if it is found that the information made available to the council in the application contained inaccuracies which materially influenced the decision and the effects of the exercise of the consent are such that it is necessary to apply more appropriate condition.

**Appendix 1: Example Routine Visual Inspection Checklist for an Embankment Dam**

Item No.	Description	Observation/Comment
E1	Record reservoir level (e.g. metres above mean sea level)	
E2	Is there reservoir shoreline instability or erosion?	
E3	Is the upstream face showing any erosion, instability, depression or cracking?	
E4	Is the dam crest showing any deformation, misalignment, depressions or cracking?	
E5	Is the left abutment showing any instability or seepage, including where the dam embankment contacts with the abutment?	
E6	Is the right abutment showing any instability or seepage, including where the dam embankment contacts with the abutment?	
E7	Is the downstream face showing any instability, deformation, depression, cracking or seepage?	
E8	Is the dam toe showing any erosion or seepage?	
E9	Measure the total dam seepage (e.g. time to fill 1 litre container, or mm head over a 90 degree v-notch weir)	
E10	Is the service or flood spillway entrance obstructed? Is the spillway, including the outlet, damaged or eroded?	
Other Comments and Observations (e.g. unusual events since last inspection, vegetation issues, operating issues etc).		

## ADVICE NOTES

1. The consent holder shall obtain all other necessary consents and permits, including those under the Building Act 2004, and the Historic Places Trust Act 1993. This consent does not remove the need to comply with all other applicable Acts (including the Property Law Act 2007), regulations, relevant Bylaws, and rules of law. This consent does not constitute building consent approval. Please check whether a building consent is required under the Building Act 2004. Please note that the approval of this resource consent, including consent conditions specified above, may affect a previously issued building consent for the same project, in which case a new building consent may be required. If not all resource consents have been applied for, it remains the responsibility of the consent holder to obtain any and all necessary resource consents required under the relevant requirements of the Resource Management Act 1991.
2. If you disagree with any of the above conditions, or disagree with the additional charges relating to the processing of the application you have a right of objection pursuant to Sections 357A or 357B of the RMA. Any objection must be made in writing to Council within 15 working days of notification of the decision.
3. Section 138 RMA specifies the conditions relating to surrender of a resource consent. A consent authority may refuse to accept the surrender of part of a resource consent where that may: affect the integrity of the consent; affect the ability of the consent holder to meet other conditions of the consent; or lead to an adverse effect on the environment. There also remains some liability to the person surrendering the resource consent under (3)(a) and (b) of this section. This liability relates to breaches of conditions of consent occurring before surrender and to the completion of work required to give effect to the consent. The Council would be unlikely to allow the surrender of this consent under section 138(2)(c) without supporting information indicating that no on-going risk was posed to human health and safety, or the environment. The consent holder is advised that before the consent can be surrendered, the dam will have to meet the requirements of the permitted activity rules in the ARC's relevant regional plan.



## DEFINITIONS

ACRPS:	means Auckland Council Regional Policy Statement
Council:	means The Auckland Council
HGMPA:	means Hauraki Gulf Marine Park Act 2000
NES	means National Environmental Standard
NPS	means National Policy Statement
NZCPS:	means New Zealand Coastal Policy Statement 2010
RMA:	means Resource Management Act 1991 and all amendments
Team Leader:	means Auckland Council Team Leader (Water Allocation) or nominated Auckland Council staff acting on the relevant Team Leader's behalf

Appendix 7: 'Wetland' near the confluence of the Wairaka and Te Auaunga



**Figure 2:** Wairaka Stream through the Mason Clinic

Appendix 8: Te Auaunga



**Figure 3:** Te Auaunga immediately upstream of Great North Road culvert.

Appendix 9: Daylighting opportunity photographs



**Figure 4:** Recently (post-March 2021) daylight reach of Wairaka



**Figure 5:** Remaining daylighting opportunity

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	E10
<b>Specific request</b>	Please provide an assessment of the Plan Change Request against the NZCPS, including an assessment of effects on the Significant Ecological Area – Marine, immediately adjacent to the site.
<b>Reasons for request</b>	Section 75 of the RMA states that a district plan must give effect to the New Zealand Coastal Policy Statement (NZCPS). As the Plan Change area is located within the coastal environment, the provisions of the NZCPS are relevant matters for consideration for a Plan Change Request.
<b>Applicant response provided by</b>	John Duthie of Tattico

**Applicant response**

**Background**

- 1 This clause 23 request asks for an assessment of this plan change against the National Policy Statement on Freshwater Management (*NPS:FW*).
- 2 This response should be read in the context of the information set out in the Morphum response to clause 23 requests E1-E9.
- 3 This response relies on the ecological assessment, including the identification of streams and wetlands. Tattico have taken this ecological analysis and assessed that in the context of the *NPS:FW*, including an analysis against whether the National Environmental Standards on Freshwater Management (*NES:FW*) apply.
- 4 The Morphum report identifies that:
  - (a) The only stream/river within the precinct is the Wairaka Stream which runs from the southern central portion of the precinct at the Puna, first flowing north and then west to join into Te Auaunga/Oakley Creek.
  - (b) There are no other streams or natural wetlands within the precinct.
- 5 There is an artificial wetland in the southern portion of the precinct. This was created in circa 1960s by Unitec as part of an environmental research study into stormwater management techniques.

- 6 There is also an artificial wetland on the western side of the Unitec campus within the Crown owned land. This was intended to treat stormwater run-off from the new Unitec Trades building. However, Council changed its preferred method for treating stormwater, generally preferring other methods within the treatment train process. This included using non-contaminating roofing and cladding materials on the Unitec Trades building. Identification of this artificial stormwater pond on Precinct plan 1 is accordingly proposed to be removed as part of this plan change.
- 7 This plan change does not seek to modify any of the Auckland-wide provisions or overlay provisions. All the standard controls on streams, wetlands, water quality and significant ecological areas, to the extent that they are relevant, continue to apply within the precinct.
- 8 In addition to these Auckland-wide rules, the precinct provisions maintain the existing open space classifications over the Puna and Wairaka Stream, as shown within Precinct plan 1. This is unchanged by the plan change.
- 9 As referenced above, the only stream within the precinct is the Wairaka Stream. The plan change does not propose any amendment to any provisions in the Auckland Unitary Plan (Operative in Part) (*AUP*) relevant to the protection of Wairaka Stream. Furthermore, the backbone consent, which the Marutūāhu and Waiohua-Tāmaki Rōpū have obtained, gave approval to the daylighting of the portion of Wairaka Stream immediately west of the Spine Road, where it ran within a box culvert through both the Crown and Te Whatu Ora – Health New Zealand owned land parcels. These works have been completed on the Crown land, with the stream now partially daylighted and the significant landscape revegetation in place.
- 10 The artificial stormwater wetland in the east comprises two ponds, a small pond in the south which drains into the larger wetland in the more central part of the precinct. The central wetland is an artificial wetland. Notwithstanding that it is artificial, it is retained under this plan change and identified within an area of “open space” on Precinct plan 1.

**NPS:FW**

- 11 The NPS:FW sets a range of policies designed to protect rivers, streams and natural wetlands. It sets a hierarchy of objectives with *the health and well-being of water bodies and freshwater ecosystems* listed as the first priority. Wairaka Stream is retained and protected through the various AUP provisions (including the precinct). This primary objective is therefore satisfied.
- 12 The NPS:FW relevant policies are set out below:

**Policy 1:** Freshwater is managed in a way that gives effect to Te Mana o te Wai.

**Policy 2:** Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.

**Policy 3:** Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.

**Policy 4:** Freshwater is managed as part of New Zealand's integrated response to climate change.

**Policy 5:** Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.

**Policy 6:** There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.

**Policy 7:** The loss of river extent and values is avoided to the extent practicable.

**Policy 8:** The significant values of outstanding water bodies are protected.

**Policy 9:** The habitats of indigenous freshwater species are protected.

13 The plan change will give effect to these policies. In particular:

(a) The Puna and Wairaka Stream are protected through the AUP wide provisions and the open space identification on Precinct plan 1.

(b) Objective 10, as proposed to be amended through the plan change, states:

An integrated urban environment is created, which:

...

(b) Recognises, protects and enhances the environmental attributes of the precinct in its planning and development;

(c) Virtually all built development (with very limited exceptions) and all subdivisions will trigger resource consent to enable appropriate Council assessment of development.

(d) The Rōpū have been involved in the development of the plan change and in the identification of the open space areas protection of the Wairaka Stream and Puna.

(e) The Wairaka Stream is considered in the context of the Stormwater Management Plan adopted by Council for the whole precinct.

(f) There is no loss of natural streams through this plan change. In fact, the daylighting of part of the stream has enhanced its ecology in terms of the planting of native vegetations along the stream margins and creating a more natural stream bed and banks.

14 In addition, while identification of the smaller artificial wetland within the precinct is proposed to be removed, the largest artificial wetland is retained.

**NES:FW**

15 The NES:FW primarily relate to development consents and the resource consent process. They are not directly relevant to the plan change.



- 16 Having said that, the development within the precinct undertaken to date clearly demonstrates the workings of the NES:FW in that the Marutūāhu and Waiohua-Tāmaki Rōpū resource consent sought approval for daylighting of the Wairaka Stream, and also for a water-sensitive design for the new Outfall #6, which provided for above-ground conveyance of stormwater within a large planted swale. These works have been completed and put in place to a high standard.

**Summary**

- 17 As set out above, demonstrably this plan change is consistent and, to the extent required, retains mechanisms to protect the Wairaka Stream in accordance with the objectives of the NPS:FW. This is set out in both the objectives and policies in the precinct provisions and the relevant open space identification provisions of Precinct plan 1.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

**EA1**

**Specific request**

Please provide an expert's assessment of the appropriate level of retail space and distribution within the precinct, including the proposed supermarket.

NB: The response to this question may be combined with the RFI in UD6.

**Reasons for request**

There has been a sizeable increase in the proposed number of dwellings (and their location) since the earlier retail assessment that informs the existing retail caps. It is important to understand what level of retail activity would adequately serve the likely future residents (and other retail demand arising within the precinct) and be appropriate within the context of the surrounding urban centres hierarchy. It is important this takes account of any updated yield information. Changes to the appropriate spatial distribution of retail within the precinct (from the previous assessment) may occur as a result of both changes to the proposed distribution of land uses within the precinct as well as increases to the overall dwelling scale (and consequent retail demand).

**Applicant response provided by**

Tim Heath, Property Economics and John Duthie of Tattico

**Applicant response**

- 1 This proposed plan change is advanced on the basis of adopting without change, the current retail cap and core retail location within the existing Wairaka Precinct.
- 2 The retail issues were extensively worked through at the time that the precinct was introduced into the Auckland Unitary Plan (Operative in Part). Here the appropriate balance between providing for local servicing for the new Te Auaunga community, Unitec and the residential dwellings east of Carrington Road, while retaining the economic viability of Point Chevalier and Mount Albert town centres, was carefully worked through.
- 3 That resulted in establishing a retail cap within the precinct as a permitted activity of 6,500m<sup>2</sup> gross floor area and a supermarket cap inclusive within the 6,500m<sup>2</sup> of 1,500m<sup>2</sup> gross floor area (GFA).

## Responses to Auckland Council RMA cl 23 Requests | EA1 & EA2 | 2

- 4 Property Economics have undertaken a high level analysis of the current provisions to determine the validity or otherwise of those standards. Their professional opinion, summarised below, is that the level of retail opportunity remains appropriate and the location of a retail hub at the Farm Road Gate 3 area is the preferred location.
- 5 This plan change request effectively keeps the same cap on retail, the same limit on a supermarket and the same core location.
- 6 The plan change request does involve a reallocation between the campus use and general retail use due to the change in type and location of development within the precinct, i.e. a reduction in the campus and an increase in general residential.
- 7 To assist determining the appropriateness of the proposed retail floorspace cap (up to 6,500sqm, including supermarket of up to 1,500sqm) within the Te Auaunga Precinct, Property Economics has forecast the level of convenience retail spend and sustainable GFA utilising its Retail Growth Model.
- 8 The retail cap of 6,500sqm is small in retail market terms and would predominantly provide convenience retail store types and commercial service activities. These store types in practise would not be able to draw customers from a wide catchment due to superior offers in close proximity (Point Chevalier, Mount Albert, St Lukes and Stoddard Road). Therefore, the stores would primarily be servicing local Te Auaunga Precinct residents, workers, and visitors.
- 9 The supermarket potential within the Te Auaunga Precinct is limited given the surrounding supermarket network.
- 10 As such, a smaller 1,500sqm GFA supermarket (i.e., the operative supermarket cap) is considered appropriate to cater for the day-to-day, frequently required 'top-up' food requirements of residents within the precinct.
- 11 The location of the supermarket, specifically accessible through the Farm Road intersection, is considered suitable due to the presence of Te Auaunga / Oakley Creek to the precinct's west side. This natural barrier would hinder the accessibility and visibility of the supermarket. By locating it adjacent to the Farm Road intersection, a relatively central position within the precinct, it would enable a more efficient functioning of the supermarket and enhance its integration with the neighbouring residential areas and the existing Unitec campus.
- 12 The Property Economics analysis indicates the operative retail floorspace cap of 6,500sqm GFA would be more than sufficient to cater for the convenience retail and commercial service requirements of an 'at capacity' residential yield of 4,000 – 4,500 dwellings within the Te Auaunga Precinct, and there is likely to be flexibility in the 6,500sqm provision for non-commercial tenancies such as community facilities and other amenity and social based activities.
- 13 The analysis shows the operative 6,500sqm retail floorspace cap is appropriate to cater to the local demand, without affecting the growth potential, role, and function of the adjacent commercial centres, particularly given the 1,500sqm supermarket cap.

- 14 Under I334.8.1 the Council will restrict its discretion to several matters when assessing a restricted discretionary activity resource consent application within the precinct. This includes restricting its discretion to “the effects on the needs of the Campus and servicing the local demand within the precinct, the role, function and amenity of the Point Chevalier and Mount Albert town centres” (5(d).ii). This means that the potential detrimental impact (if any) of retail activities within the precinct on the campus and other centres can be assessed at that time.
  
- 15 Additionally, considering economic efficiency, Property Economics considers that a majority of the GFA (circa +70%) should be concentrated within the core location for the retail hub. Any remaining retail floorspace in other locations should be limited in scale and primarily focused on providing convenience-based offerings. Therefore, Property Economics considers that the proposed allocation of retail space, as outlined in the Retail threshold standard I334.6.2 (i.e., a GFA cap of 4,700sqm within the Business - Mixed Use Zone and a cap of 1,800sqm within the Special Purpose - Tertiary Education Zone), is appropriate.

<b>Question</b>	<b>EA2</b>
<b>Specific request</b>	Please provide an expert's assessment of the likely level and take up of other commercial activity within the precinct and its alignment with Auckland's intended pattern of business growth.
<b>Reasons for request</b>	This is important to understand the likely level of other (non-retail) business development within the precinct and how this aligns with Auckland's intended patterns of business growth. This includes understanding the projected uptake of business capacity provided within the precinct. Other business activity enabled within the precinct may also overlap with the types of activities locating within the surrounding urban centres hierarchy. Employees and businesses within the other (non-retail) business activity will also generate additional demand for retail, hospitality and services within the precinct.
<b>Applicant response provided by</b>	Tim Heath, Property Economics
<b>Applicant response</b>	<ol style="list-style-type: none"> <li>1 In Property Economics view, considering the consented 4,000 – 4,500 dwellings, the sustainable non-retail commercial development within the precinct would be circa 1,400 – 1,700sqm, depending on the scenario used. This is similar to the non-supermarket convenience retail provision as these are typically of similar proportion in local convenience centres.</li> <li>2 The uptake of this 'business' provision, like the retail provision, is likely to be commensurate with population and dwelling growth within the Te Auaunga Precinct. This growth will occur as the wider local catchment also grows to support the other centres in the surrounding catchment. As identified earlier, this level of business provision is commensurate with the 'at capacity' future market requirements and can be realised without compromising the growth potential, role and function of any other centre in the network.</li> <li>3 In respect of whether this aligns with the intended patterns of business growth across Auckland, these business growth patterns need to reflect where residential development occurs, or is planned, to ensure an economically efficient distribution of business activity is provided across Auckland.</li> <li>4 Providing business opportunities (employment, convenience retail and commercial services activities) is more efficiently delivered to the market closest to the source of that demand. In this instance this is within the Te Auaunga Precinct.</li> <li>5 The higher the level of employment internalisation in a growth node, the more efficient the growth is from a business and retail perspective. The Te Auaunga Precinct provision is more than sufficient to accommodate this demand without compromising the surrounding centre or their growth.</li> </ol>

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	T1, T2, T3, T4 & T5
<b>Applicant response provided by</b>	Max Robitzsch, Stantec & Don McKenzie (sub-consultant to Stantec)

**Overview of applicant Response**

- 1 This is a combined response for questions T1, T2, T3, T5 & T5.
- 2 These questions largely focus on the ITA document (Stantec, June 2020, approved by Auckland Council March 2021).
- 3 While the approved ITA remains relevant for the plan change application, significant parts – including matters such as the queried development assumptions and trip generation rates – have since changed, and instead are referenced in the Te Auaunga Plan Change - Transport Assessment & Traffic Modelling Report, referenced herein as the “TMR” (Stantec, December 2022). The TMR also identified which of the previous ITA assumptions remain valid (such as the overall transport environment and related principles). Thus both documents have to be read together to assess the plan change application. These documents were included in the package of documents contained in Appendix 5 to the plan change request: “Te Auaunga Precinct 2022: Integrated Transport Assessment”.
- 4 As such, we will refer to the updated statements made in the TMR, rather than those in the original ITA being queried in the responses to these questions.

**Specific request T1** With reference to ITA Section 5.8 and Appendix E please provide evidence to confirm consistency of the new heights proposed under the PC with trip generation assumptions in the ITA, including correlation between building height and gross floor area / development yield, and in turn, trip generation.

Please also provide an alternative higher trip generation scenario, in the event that higher development yields could be achieved under the new permitted height limits (see Planning P1 below).

**Reasons for request  
T1**

The AEE / Section 32 Report refers to areas within the precinct where increased height is to be permitted, to in turn enable additional growth. However, it is not clear as to how this has informed the assessment of trip generation potential within the ITA, in Section 5.8 and Appendix E, with regards to correlating increased building heights with corresponding increases in gross floor area, numbers of residential apartments and other related land-use metrics.

Further analysis of the correlation between building heights, development yield and consequent trip generation potential is therefore considered appropriate in order to understand the full potential longer-term transport effects of the proposal.

Please note that this analysis should be informed by any updated yield information as a result of RFI P1 below.

**Applicant response**

**Consistency of new heights with trip generation assumptions**

- 1 Regarding the influence of added height on trip generation, there is no direct influence of this on the traffic modelling, as the traffic model is fundamentally based on a number of dwellings, rather than building heights. As such, while changes in height proposed do play a role in changing the number of dwellings that HUD considers can be provided, traffic modelling is solely based on assessing the impacts created by the targeted number of residential dwellings (and other activities, where relevant).
- 2 As heights are not changing to the same level across the whole precinct, changes in height enabled by the plan change could in practice lead to changes in traffic distribution *within* the precinct - with more traffic originating, as a percentage of all precinct traffic, from some areas than before.
- 3 For clarity, it is acknowledged that when the traffic-modelled number of dwellings was increased from the ITA assumptions to the TMR (plan change) assumptions, the increase was distributed linearly (i.e. all internal areas were factored to the same degree).
- 4 This was done in this more simplified manner because HUD and the development partners cannot yet identify the exact numbers of dwellings for the various areas within the centre and north of the precinct, only the overall maximum assumption being sought – these being the scale of dwellings and associated trip generations used in the TMR modelling (superseding the ITA).
- 5 However, the precinct is spatially relatively small – excluding the southern zones (disconnected in motor vehicle terms from the central and northern areas), the maximum distances are around 800m. The central and northern areas are also interconnected for motor vehicle purposes, and their only links to the wider network are via the same “gates” all connecting onto Carrington Road.

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- 6 Small changes in the “centre of gravity” might be caused by local height changes being more substantial in one area compared to another area, or one area seeing slightly more intensive development than the other. However, for the above reasons, they will tend to quickly redistribute themselves within the precinct based on traffic conditions at the “gates” (path of least resistance based on congestion and roading design). All such traffic in any case will travel along the same external route (Carrington Road). As such, the slight simplification is not considered to have any material impacts on the assessment of traffic impacts undertaken within the TMR.
- 7 It should also be noted that a significant part of the “added development” now being traffic modelled is not in fact additional proposed density created by either zoning changes or permitted height changes – rather a large part of the added density represents a simple extension of the modelling horizon to a point where more of the already permitted density is assumed to have been constructed. Further discussion on the difference between the yield enabled by the operative provisions and the new plan change requested precinct provisions has been provided by John Duthie in clause 23 response P8B.

### Alternative higher trip generation scenario

- 8 Regarding the request for an “alternative higher trip generation scenario”, this is not considered necessary, as the ITA / TMR already sets effective traffic-related limits of development via the maximum development assessed (as per Section 3 of the ITA, for 2,049 dwellings by 2028, respectively as per Section 2 of the TMR, for 4,000 dwellings by 2031 – plus the relevant other non-dwelling activities within the precinct for each scenario).
- 9 If HUD, or one of the development partners in the precinct, proposed to substantially change or exceed these assumptions in the future, this would then not be in accordance with the ITA, including the TMR. Accordingly, this would then lead, at that time, to a requirement to provide a new or revised assessment to exceed those levels (and/or an updated ITA / traffic model), as required by the proposed precinct provisions.
- 10 As such, an “alternative higher trip generation scenario” for potential “higher yields” has relevance only if such a proposal for more development is made in the future. It is not a scenario that HUD seeks direct or indirect approval for with this plan change application.

### Specific request T2

Please provide further clarity for the choice of trip rate reductions cited in section 5.8.2.1 of the ITA, namely:

- 10% reduction in tertiary education Trip Rates, based on ‘likelihood of remote learning’
- 30% reduction in tertiary education trips, due to behavioural change influenced by network congestion

And similarly for the choice of trip rate reduction cited in section 5.8.3.3:



## Responses to Auckland Council RMA cl 23 Requests | T1, T2, T3, T4 & T5 | 4

- 25% reduction in residential trip rates in the North-west, northern and Carrington Zones, due to congestion driving a stronger mode shift (compared to 20% agreed with AT)

The above percentage reductions should be supported by appropriate quantitative evidence, for example, in relation to the impacts of remote learning on education trip generation, or the influence of severe congestion on encouraging modal shift.

Please also confirm whether these percentage reductions have been agreed with AT.

**Reasons for request T2** In the absence of reasonable evidence to support the proposed reductions, and confirmation of their agreed use with the Road Controlling Authority (AT), it is not possible to verify that a fair and robust assessment of trip generation and transport network performance has been undertaken.

### Applicant response

#### Trip rate reductions

- 1 Section 3.6. Table 5 of the TMR contains a summary of the trip generation rate changes between the ITA traffic model and the TMR traffic model.
- 2 Before addressing specific rates, it is useful to set out the overall approach to trip generation rates.
- 3 Having identified a specific level of development sought (which is largely enabled by the zoning and enabled heights even before the plan change; refer discussion in T1), traffic and transport work in preparation for the plan change focussed as much on reducing (car) traffic generation as on accommodating it. This is in line with both the precinct's policies<sup>1</sup>, the approved ITA's transport vision<sup>2</sup> and Government policy.<sup>3</sup>
- 4 However, in the review of traffic models and their assumptions, there is often an approach of assuming "conservative" trip generation rates as a default, to be "on the safe side" - or to undertake modelling with such higher rates (i.e. as sensitivity tests) which then become treated as "de facto" impacts being discussed.
- 5 HUD, advised by Stantec, acknowledges that using conservative rates historically generated by Auckland developments – even some apartment developments – would lead to significantly higher traffic (congestion and parking) impacts than described in the TMR.

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<sup>1</sup> Auckland Unitary Plan Operative in Part, 1334.3 Policy 22 – *"Manage the expected traffic generated by activities in the precinct to avoid, remedy and mitigate adverse effects on the safety and efficiency of the surrounding transport network, particularly at peak times..."*.

<sup>2</sup> Section 4.1 of the approved ITA – *"...the ITA envisages that the Precinct... will have a transport environment that: Avoids excess vehicle dominance (whether for movement or car parking)..."*.

<sup>3</sup> New Zealand Government Emissions Reduction Plan 2022, Summary Document – *"... reduce the total kilometres light vehicles travel by 20 per cent by 2035..."*.

- 6 These impacts would likely result in a need to either reduce the proposed development, significantly increase vehicular capacity on surrounding roads, or accept higher levels of congestion. Clearly, none of the three outcomes are desirable. In practice, significant capacity increases for private motor vehicles would also be prohibitively expensive / impractical, and arguably would run contrary to overarching policies such as the ones cited above.
- 7 However, as set out in the ITA and TMR, the precinct is very well-suited to medium-high density residential development from a transport perspective. It will see significantly reduced traffic impacts overall for Auckland averages – both in terms of trips generated and trip lengths (VKT created) – than the same number of dwellings created in greenfields locations on Auckland’s fringe. This is even before acknowledging the reduced mode share for public transport and active modes possible in such further-out greenfield locations.
- 8 As such, any discussion about trip generation assumptions for the precinct that may be considered as “aspirational” by reviewers should focus not on increasing the trip generation “to be safe”.
- 9 Instead, discussion should focus on what measures (physical, operational or in terms of review conditions) – “carrots and sticks” – are necessary to give authorities confidence that the trip generation rates assumed will eventuate in reality.
- 10 The applicant team considers that such significant measures are already being proposed, with strict car parking constraints being the most immediate (“stick”), and improvements to non-car modes being the other main change (“carrot”).

*Education trip rates*

- 11 Regarding the specific education trip rate query, we consider that the question seems to mis-identify the (most relevant) rates being applied in the TMR.
- 12 It is correct that a 10% reduction to historically appropriate tertiary education trip generation rates is proposed for the 2024 Scenario A of the ITA, rising to a reduction of 30% by the 2028 Scenario B.
- 13 However, the TMR further reduces this - reducing the original 0.11 trips / student during the peak hour to 0.07, a reduction of about 36% in total, or roughly one third reduction (see Section 5.8.2.1 of the ITA and Section 3.6 of the TMR).
- 14 While this is obviously a significant and aspirational change, this reduction is a combination of many various “carrot and stick” factors on the (driving) behaviour of Unitec’s students – not just one factor in isolation. The influences include:
  - (a) Remote learning: The current tertiary education realignment in New Zealand makes it somewhat more difficult to identify remote learning policy offerings likely to be typical in the future. However, this is now significantly more typical than before Covid and is likely to form a large part of any student’s learning experience. This also includes more informal cooperation by students as well, rather than necessarily meeting for group projects at the Unitec site.
  - (b) 2023 Census data – expected to be available before the plan change hearing – is likely to also assist with a better post-Covid data base regarding remote learning / working levels.

- (c) Unitec’s Travel Demand Management – the Travel Plan for Mt Albert Campus (2020-2021)<sup>4</sup> sees potential to reduce car traffic by a third (which is the same level as the TMR assumes) and focusses on the development of a carpooling system and encouragement of active commutes. It states:

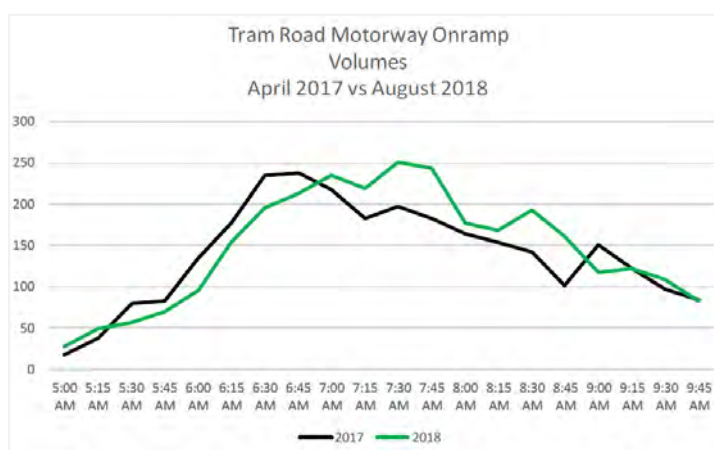
*“Over the next few years, as campus retracts back to the core, we will have less space for parking. This is our opportunity to develop a campus that supports healthy, sustainable travel choices.”*

- (d) Congestion impacts: For example, where students choose to travel earlier or (where feasible) later, or switching to other transport modes such as bus, train & walk, or cycling because increased congestion as identified in the TMR makes driving a less attractive mode in relative terms than it is now. This is especially relevant as projects such as the Carrington Road Upgrade at the same time aim to improve public transport and active modes.

- (e) Research into demand peak spreading is discussed in detail in New Zealand Research Report No 241<sup>5</sup> and a number of other studies e.g. [emphasis added]:

*“As congestion increases in urban road networks, there is a tendency for the distribution of traffic during peak periods to become more uniform, as journeys are **delayed or deliberately re-timed** to avoid the worst parts of the peak periods”.*<sup>6</sup>

- (f) An example from Christchurch<sup>7</sup>, refer below, shows Tram Road on-ramp traffic volumes pre-Western Belfast Bypass (WBB) completion in 2017 and post-completion in 2018. It shows traffic demand profile peaked at around 6:30am earlier in 2017 as people chose to travel earlier to avoid congestion compared to 7:30am peak after the completion of WBB. The difference in travel demand during any specific time peak hour was around 10%-25% upwards / downwards, showing that congestion can directly affect demand.



<sup>4</sup> <https://oneplanet.unitec.ac.nz/wp-content/uploads/2022/02/Travel-Plan-2020-and-2021.pdf>.

<sup>5</sup> <https://www.nzta.govt.nz/assets/resources/research/reports/241/241-Research-into-traffic-peak-spreading.pdf>.

<sup>6</sup> <https://assets.highwaysengland.co.uk/roads/road-projects/a2-bean-ebbsfleet-junction-improvements/Orders/I.8+DMRB+Part+1+Traffic+Appraisal.pdf>.

<sup>7</sup> Cited in “NZ Modelling User Group (MUGs) Micro Time-of-Day Choice Research Validation of Existing MTC Methods”, report by Stantec, V4, August 2021.

- (g) Public transport improvements: The assumptions made in the TMR are for vehicle traffic levels in 2031, some eight years from the time of production of the TMR. Despite recent difficulties for public transport patronage in Auckland caused by Covid effects and driver shortages, it is considered realistic to expect that access by public transport to the precinct will significantly improve in the coming eight years from its already very good accessibility levels.
- (h) The ITA discusses the expected changes in Section 4, while the TMR also discusses further public transport-related improvements (particularly an extended Carrington Road Upgrade scope) in Section 2.4.
- (i) Active mode improvements: Similar to the public transport improvements, safer and more convenient ways to walk, cycle or scooter to the precinct will also assist in reducing the trip generation rates. Making connections to and from the Western Line train stations more accessible also boosts multi-modal trips (walk-train, cycle-train).
- (j) The ITA discusses the expected changes in Section 4, while the TMR also discusses further public transport-related improvements (particularly an enlarged Carrington Road Upgrade scope) in Section 2.4.
- (k) Unitec charging for car parking – the site survey of existing trip generation at the Unitec site in 2014 was undertaken at a time when car parking in the precinct was both plentiful and fully free.<sup>8</sup> Unitec's parking availability has since shrunk substantially, and Unitec have confirmed to HUD that car parking will in the future be charged. This will make driving to the Unitec campus significantly less attractive.

15 All these assumptions are expected to significantly reduce the historically "suburban" driving patterns among Unitec students as Auckland urbanises further.

16 In regard to "sanity checking" the projected total reduction, it is useful to assess the car mode share percentages of other New Zealand tertiary institutes. While the 45% driving (driver or passenger) mode share rate found for Unitec students in 2018 is unlikely in the foreseeable future to drop to the 4% to 13% driving mode shares achieved at City Centre and City Centre Fringe tertiary education institutes in Auckland<sup>9</sup> an effective "one third reduction" as per the trip rate assumptions only requires this 45% to drop to 30%.

#### *Residential trip rates*

17 Regarding the question on further residential trip generation rate reductions in the North-west, northern and Carrington areas in the ITA, we refer to the discussion in Section 5.8.3.3 of the ITA. While the added increase from 20% to 25% was not explicitly agreed again with Auckland Transport, it is noted that the ITA has since been approved by Auckland Council – this included extensive Auckland Transport feedback to Council. As such, the ITA rates, including these reductions can be considered the agreed baseline, from which further changes in the TMR proceed.

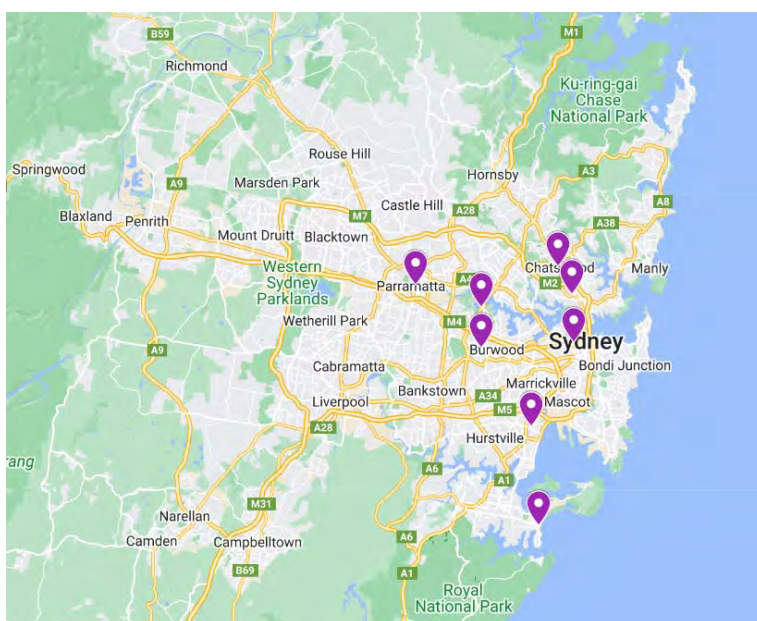
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<sup>8</sup> In 2014, there were approximately 2,650 car parks available to students and staff, based on *Report on Car Parking at Unitec Campuses For Commercialisation of Car Parking for Unitec, Silvereye, 2014*.

<sup>9</sup> Section 2.4.2 of the ITA and Table 4.3, Auckland Transport Tertiary Student Travel Survey 2018.

## Responses to Auckland Council RMA cl 23 Requests | T1, T2, T3, T4 & T5 | 8

- 18 In this regard, as set out in the TMR, significant further changes in assumptions have occurred since the ITA. This is in part because some of the rates in the ITA are considered by HUD as rates that were chosen in 2020 “to be safe”, rather than to represent rates resulting from more stringent “carrot and stick” measures to reduce private car travel to and from the development.
- 19 The inclusion of more stringent measures than in the ITA – most substantially, a significant reduction of car parking compared to the ITA assumptions – also results in a need to differentiate more between different trip generation rates for different types of dwellings. This includes differentiating rates by the average level of car parking (if any) the dwellings will provide.
- 20 This is discussed in detail in Section 3.6.3 of the TMR and broken down by areas before being summarised in Appendix A of the TMR.
- 21 The TMR in these sections also discusses surveys by Transport for New South Wales (formerly Roads and Maritime Services). Published as far back as 2013, this survey data supports reduced rates as being realistic. The relevant study assessed trip generation rates of urban apartments with good public transport access in Sydney. The areas where surveys took place are shown below:



- 22 The trip generation study in Sydney covered high density residential areas that comprised mostly 2+ bedrooms. The number of dwellings at the surveyed developments ranged between 28 and 234 dwellings with an average of 100 dwellings per development and the parking ratio per dwelling ranged between 0.64 to 1.60 with an average rate of 1.24 parking spaces per apartment.
- 23 For the proposed development at Wairaka, out of the 4,000 dwellings, at least 1,000 are intended to provide no car parking at all, while the remaining 2,000 will provide 0.7 or less car parking spaces per apartment on average. Such parking ratio per dwelling is therefore towards the lower rate of the surveyed data in Sydney.
- 24 In addition to that, as set out in the TMR's relevant section, the rates for the 2031 traffic model remain still higher than the Sydney rates:

*...represented a halfway average between the 2020 ITA trip generation rates for the 1.5-bedroom and the average surveyed Sydney trip rate per unit (the higher of trip rate per unit, per parking space and per bedroom).*

- 25 The survey data identifies that while chosen rates are notably lower than applied in Auckland in the past, they are far from unrealistic in comprehensively planned, parking-constrained and well-located developments such as those proposed for the precinct.

**Specific request T3** Please assess options for southern connections to the Precinct (via Laurel Street / Renton Road / Rhodes Avenue), but with access limited to walking and cycling and potential public transport use.

**Reasons for request T3** While any vehicular access via Laurel Street, Renton Road and Rhodes Avenue would require a change to Wairaka Precinct Rule 1334.3(26), which currently precludes direct vehicle access to and from the south, an arrangement allowing for access limited to use by sustainable modes of travel could contribute toward strategic aims to achieve modal shift.

The ITA references a previously considered 'back route' bus service following the north-south spine and looping via Carrington Road at both ends of the Precinct, which AT previously did not support due to slow service speeds compared to Carrington Road.

However, a potential variation to this proposal could include a re-routing of such a bus service via a new bus-only link to the south of the Precinct, which would provide buses with the advantage of a shorter-distance route compared to general traffic.

The ITA acknowledges previous consideration towards additional access to the Precinct from the south, and while it confirms that the arterial road network to the southeast of the precinct is currently not forecast to experience significant congestion issues which would warrant new road connections, a bus service serving the main spine road through the Precinct could have wider-spread benefits for trips generated within the Precinct.

## **Applicant response**

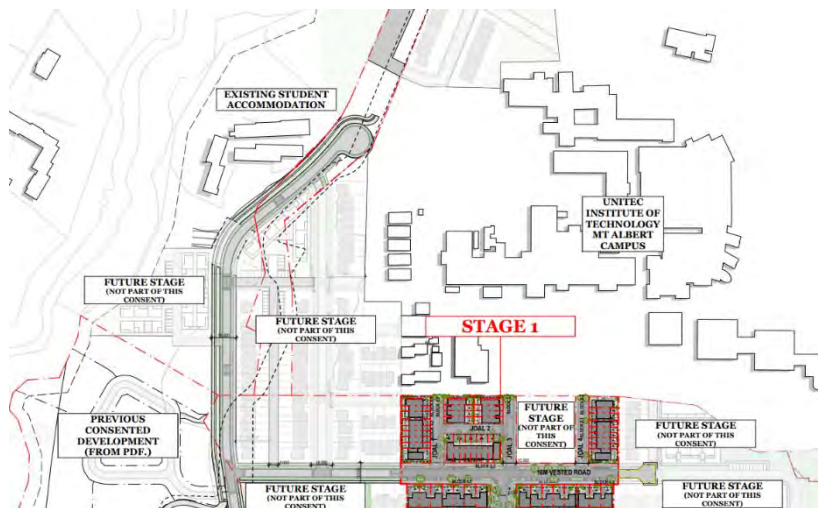
### **Precinct provisions**

- 1 To clarify in response to the question, neither the existing precinct objectives and rules nor those proposed in the plan change specifically prohibit vehicular connectivity from the southern existing residential roads into the precinct as such; rather, the various objectives, standards and matters of control / matters of discretion that intended to:
- (a) discourage direct vehicular access from these southern roads into the tertiary education site and/or any tertiary education parking buildings (e.g. policy 26 referenced in the clause 23 request and non-complying activity A30);
  - (b) discourage "rat running" through the precinct to avoid Carrington Road congestion; and

- (c) retain a residential character for the southern streets.
- 2 Extensions of the existing roads into the precinct provided that a cul-de-sac is maintained will be a permitted activity (A27) and extensions into the precinct as a public road are a restricted discretionary activity (A29), including specifically to provide vehicular connections to the western road within the precinct as sought through the plan change.
- 3 For the avoidance of doubt, neither the ITA, the ITA traffic modelling, or the updated assumptions in the Te Auaunga Plan Change – Transport Assessment & Traffic Modelling Report (*TMR*) include any vehicular connectivity between the northern and central areas of the precinct (in this regard including the Unitec tertiary education area) and the southern residential zones within the precinct and the southern existing roads. There is a clear “cut” in the traffic model preventing cross-traffic.
- 4 For completeness, it is also noted that Policies I334.3 (25) and (26) currently do not identify (list) Mark Road, which in the plan change’s version of Precinct plan 1 is proposed to also be shown as connected into the precinct. However, for avoidance of doubt, the relevant policies (and the statements made below) are considered by HUD to also cover this fourth southern local street.

**Existing consents**

- 5 For context, it is noted that the Wairaka Precinct Stage 1 development recently consented under the COVID-19 Recovery (Fast-track Consenting) Act 2020 authorises extensions to Laurel Street and Rhodes Avenue, including separated cycle and pedestrian facilities. Together with the consented Spine Road through the ‘backbone’ consent (BUN60386270) the existing precinct provisions are therefore now increasingly being translated into actual physical roading details, i.e. development envisages turning heads at the “cut” preventing vehicular cross-connections, as shown below in an excerpt from the Stage 1 application’s masterplan.



- 6 While not directly affecting the plan change (which does not propose specific roading designs, nor proposes to modify the relevant parts of the precinct rules), these plans are a good representation of what the traffic models in the ITA/TMR assume – that the “cut” will include a form of (ideally physical) barrier to vehicle connectivity, while active mode connections across the “cut” remain uninterrupted. It is also understood that there is the possibility that not all internal roads necessary for such a link will be vested as public roads by the development partners.

### **Walking and cycling connections**

- 7 The Wairaka Precinct Stage 1 consent also demonstrates how cycle and pedestrian connections are proposed to be provided in the precinct.

### **Bus-only route**

- 8 Regarding the possibility of a “back route” bus service travelling through the southern residential roads and then connecting onwards along the Spine Road across such a “cut”, it is considered that there is nothing within the precinct rules as written that would prohibit this, nor would the changes now proposed as part of the plan change modify any relevant rules. However, there would arguably be a need for any such proposal to show how a “bus only” link would be implemented in such a way to discourage private car use. Signage alone would be considered highly unlikely to be sufficient.

- 9 Auckland Transport over the last ten years has implemented an ambitious overhaul of its public transport network (the “New Network”), which re-prioritised bus services onto main corridors – to achieve greater frequencies, better reliability, and the ability to implement bus priority more effectively.

- 10 A “back route” through the precinct would appear to be contrary to the service design objectives and relevant public transport planning policy by Auckland Transport. For example, Auckland Transport says the following on their own website regarding the removal of bus stops/routes from some streets as part of the New Network re-organisation of routes [emphasis added]:

25.1 *Some of the factors we consider when removing bus services from a street include low all-day patronage, road layout constraints, [alternative] access to frequent services, and shortening the routes to make them quicker and more direct.*

- 11 These factors weigh particularly in cases where a back route would run parallel to, and in-between, two nearby Frequent Transport Network corridors whose stops are well accessible from the vast majority of the Precinct (stops on Great North Road and Carrington Road). It would also arguably undermine planned bus priority improvement on Carrington Road as part of the Carrington Road Upgrade.

- 12 In summary, it is not considered necessary or appropriate to provide specific provision for such a service in the precinct provisions themselves. There is nothing in the plan change that prevents such a “back route” from being implemented in the future, should there be changes to public transport service planning guidance, or changed local conditions that would make such a route more desirable.



**Specific request T4** Please provide an assessment based on the Woodward Road Level Crossing not being removed.

**Reasons for request T4** The Table in Section 4.9 'Summary of Transport Assumptions' assumes completion of the Level Crossing Removal in all modelled scenarios. It is uncertain at this stage what the timing of those works would be (updates from KiwiRail / AT would be beneficial in that respect).

In the event that this work does not take place by the time of completion of Plan Change development and other transport proposals, an analysis should be provided of the level of operational effects on the adjoining road network.

Further detail on this proposal would be beneficial for background context and understanding the timing and nature of adverse effects on the adjoining road network. Possible considerations could include development staging to align with the Rail Crossing works being completed and construction works being timed to avoid the construction phase of Carrington Road corridor improvements.

#### **Applicant response**

- 1 The transport reviewer appears to have read Table 4.9's relevant row as "Level crossing removal at Woodward Road".
- 2 The table's relevant row however states "Level crossing at Woodward Road" (no mention of removal). That is, the ITA (and the TMR) retain the level crossing in their traffic models in all scenarios and apply modelled penalties (to replicate the effect of periods of crossing closure) to car traffic along this route.
- 3 In earlier discussions (prior to the 2020 ITA model being finalised), it had been considered whether the removal (grade separation) of the Woodward Road level crossing would have been a beneficial change. However, tests found that in terms of the traffic models, removal did not create significant benefits.
- 4 Therefore, while there may well be advantages from a potential future removal of the crossing, perhaps as part of a future Auckland Transport/KiwiRail level crossing removal programme, the level crossing was retained in all models, and the table row states this.

**Specific request T5** Please provide a schedule of transport improvements and interventions with 'trigger points' in the form of development milestones (e.g. nos. dwellings, completion of other land use activities), at which particular improvements are deemed to be required. Please also include anticipated timescales based on latest information available.

**Reasons for request T5** While Section 4.9 of the ITA lists Transport Assumptions and interventions included in the traffic modelling scenarios, many of these are notably dependent on other parties for funding and delivery, such as the Carrington Road upgrade works to be delivered by AT.

Following recent discussions with AT, it is understood that the timeline for delivery of the Carrington Road improvements is subject to ongoing uncertainty and may extend beyond the horizons assumed for the traffic modelling scenarios (of 2024 and 2028 for Scenarios A and B respectively).

Trigger points for individual transport improvements according to levels of development completed may ultimately be seen as more appropriate, to ensure that transport effects will be mitigated in a timely manner.

It is also appropriate to revisit the traffic modelling scenarios with regard to the assessment years and particular improvements assumed in each scenario, in the event that the full package of Carrington Road improvements cannot be delivered by the respective time horizons.

## **Applicant response**

### **Carrington Road upgrade**

- 1 In December 2022, the Government announced \$113 million in funding for the Carrington Road upgrade. That funding, which was provided through the Infrastructure Acceleration Fund, is explicitly tied to the development proposed within the precinct.
- 2 Auckland Council (and then Auckland Transport (AT)) were successful in their application to the government for this standalone, competitive, grant funding round – which was not part of regular ATAP or other funding streams – as they committed to meet criteria that required the Carrington Road upgrade works timeframe to enable the housing development, and included a 2025 physical works start date. These documents can be supplied by AT. While it is appreciated that a project of this scale will always have a measure of delivery uncertainty around it, in terms of design, consenting and construction timeframes, it is not considered accurate by HUD – as one of the parties to the relevant contracts mentioned above – to characterise the status of the upgrade as having “ongoing uncertainty”.

### **Assumptions and trigger points**

- 3 The answer to this question can be found in the “assumptions” sections of the ITA (Section 3 for development and Section 4 for transport assumptions) and TMR (Section 2 for development and transport updates to the ITA). This is further summarised in tables in Section 4.9 of the ITA and Section 3.8.3 of the TMR respectively.
- 4 These sections of the ITA and TMR already provide an essentially “three stage” trigger point process which also identifies the key mitigations required:

## Responses to Auckland Council RMA cl 23 Requests | T1, T2, T3, T4 & T5 | 14

- (a) Scenario A in the ITA (i.e. to allow up to 1,023 dwellings, limited external road network changes are required beyond the first signalisation of an additional access “gate” – i.e. no Carrington Road Upgrade is required).<sup>10</sup>
  - (b) Scenario B in the ITA (i.e. to allow up to 2,049 dwellings, the Carrington Road Upgrade needs to be implemented (along the precinct frontage only) including added signalised intersections along the length including Woodward Rd).
  - (c) The TMR scenario (i.e. to allow up to 4,000 dwellings, the Carrington Road Upgrade needs to be implemented along the length of Carrington Road, not just the precinct frontage).
- 5 While these scenarios each have assumed horizon years (2024, 2028 and 2031 respectively), it is considered that the level of development and assumed mitigation represent the most relevant scenarios in response to the stated query.
- 6 As such, there is not considered to be any need for or benefit from modelling other time horizons “in case of non-delivery” (or only partial delivery) of the extended Carrington Road Upgrade.
- 7 If such non-delivery occurred, this would simply mean that development could only occur up to the assumptions of the “lower” scenario that does not yet include the missing upgrade, as new development in the precinct will be assessed for consistency with any existing ITA applying to the proposed development. Alternatively, an applicant for development could undertake new modelling and/or an update of the ITA at that time to assess alternate ways of ensuring appropriate mitigation. (Refer proposed matter of discretion I334.8.1(1A)(f)(i).)
- 8 However, the already-modelled scenarios represent a logically stepped increase in both development levels and mitigation, including assessing at what development levels the basic and extended Carrington Road Upgrades become necessary.
- 9 Therefore, the request is already considered fulfilled by the application documents.

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<sup>10</sup> It is noted for avoidance of doubt that approval of the ITA was contingent on further sensitivity modelling on AT request. This led to an agreement that the first access “gate” may need to be signalised after 600 dwellings (Gate 2 in the ITA assumptions, since proposed to instead be Gate 1 by the local development parties and modified accordingly in the TMR). This approved arrangement essentially creates an agreed **fourth scenario** (lowest-intensity in comparison), for which no signalisation or Precinct-external road upgrades (beyond tie-in adjustments at the “gates”) are deemed necessary at all.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	T6
<b>Specific request</b>	Please update the proposed Precinct Plan to show a shared path connection in the northern part of the precinct, to replace the linkage lost through proposed PC75.
<b>Reasons for request</b>	It is understood that consideration has been given to an alternative shared path route. This should be illustrated on the Precinct Plan for consideration. Note that the intention to replace this path was referred to in the 11 May 2021 MHUD letter (see also OS6).
<b>Applicant response provided by</b>	John Duthie, Tattico

**Applicant response**

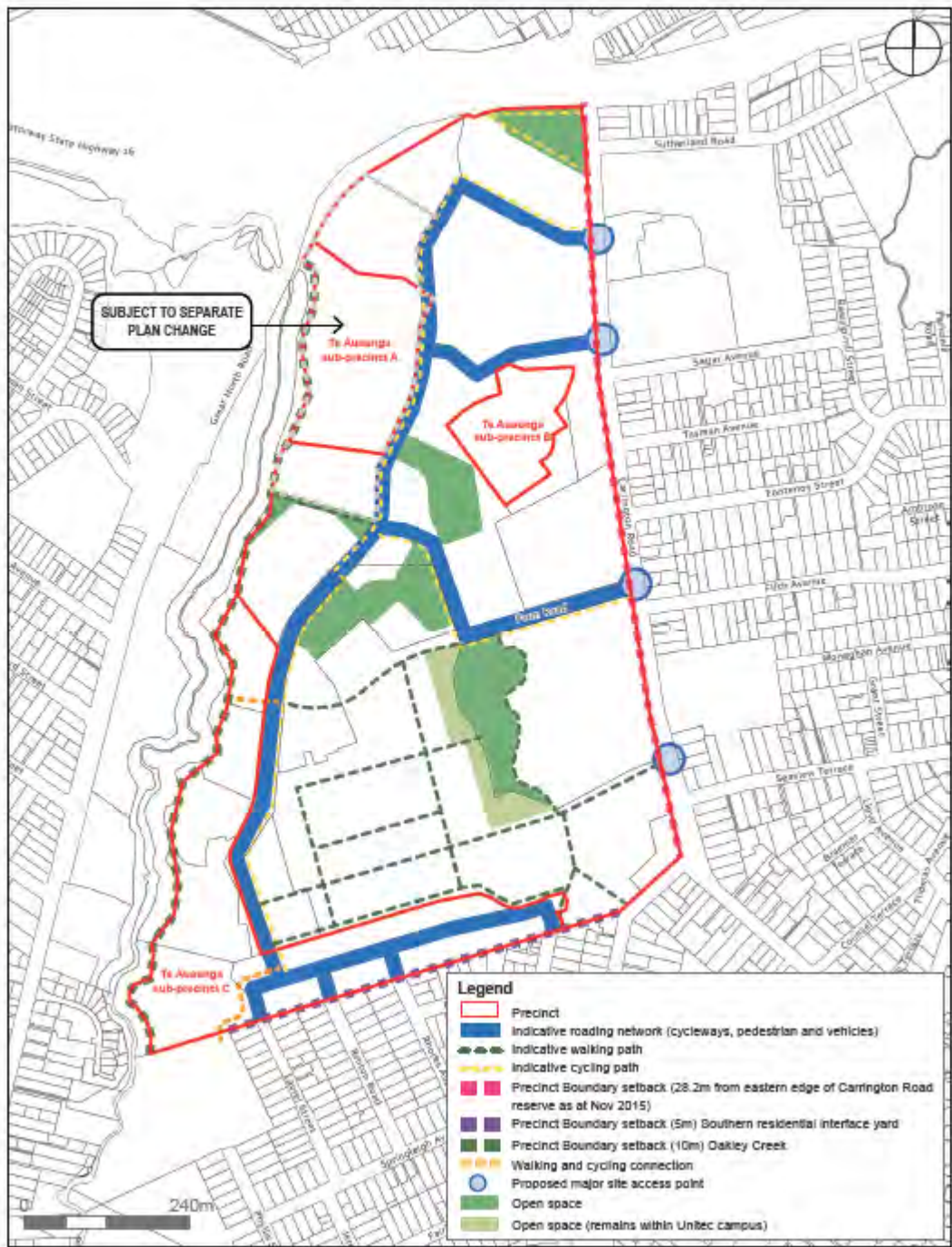
- 1 The Precinct plan map update provided with the clause 23 response package and reproduced for ease of reference below shows the proposed walking and cycling path connection in the northern part of the precinct. The new path section is proposed to run from approximately where the Northwestern Shared Path's boardwalk section finishes, travelling between Building 1 and the open space to connect to Carrington Road in the vicinity of the current path crossing south of Sutherland Road. The purpose of the new path section is to provide connectivity for future residents in the centre and north of the precinct.
  
- 2 Although we understand some alternatives have also been investigated by Council/ Auckland Transport (AT), the advantages of placing the path in this location are considered to be:
  - (a) there is sufficient space in this location to fully separate pedestrians and cyclists, avoiding the user conflicts that sometimes arise with shared paths;
  - (b) it separates cycling traffic heading further west (or east) from cyclists heading north/south, who are likely to continue along the separate cycleway within the precinct (also shown on the Precinct plan), which creates additional capacity for cycling;
  - (c) it assists with Crime Prevention Through Environmental Design and open space activation, through generating additional foot and cycling traffic adjacent to public open space; and
  - (d) it improves connectivity / directness from the west towards the expected location of the long-term signalised crossing of the path over a wider Carrington Road.

## **Responses to Auckland Council RMA cl 23 Requests | T6 | 2**

- 3 HUD has had a number of discussions with AT over this alignment. The final alignment shown on the plan below, and included in the updated set of Precinct plan maps provided for the clause 23 UD8 response, has been agreed with AT as being appropriate to provide a local connection for future residents of the precinct.

I334.10. Precinct plans

I334.10.1 Te Auaunga: Precinct Plan 1



**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** H1 & H2

**Specific request H1** Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further visual simulation viewpoints that show the (full extent) of the proposed and operative enabled new development within the context of the Oakley Hospital Main Building from:

- the Point Chevalier Town Centre (Figure 1); and
- Carrington Road (south of the motorway bridge) (Figure 2).



*Figure 1: The Oakley Hospital Main Building viewed from the western edge of Point Chevalier Town Centre.*



*Figure 2: The Oakley Hospital Main Building and front garden viewed from Carrington Road.*

**Reasons for request H1**

These are additional key views of the Oakley Hospital Main Building as experienced in the local landscape. The request has also been guided by the following statements in the HIA (p.5):

*"A distant view of the Former Oakley Hospital Building can still be had from the Point Chevalier shops and the building is also visible from Carrington Road. These views of the buildings and the landscaped area in front of the building will not be affected by the Plan Change."*

From the western edge of Point Chevalier Town Centre, the symmetrical frontage of the scheduled building is captured (compared to existing viewpoints VS5 and VS6); and from Carrington Road (heading south), views of the building within its immediate garden setting (EOP) are experienced.

(It is noted that the L5 request notes that that response may be combined with the RFI in H1.)

**Specific request H2**

Boffa Miskell Assessment of Landscape and Visual Effects: Graphic Supplement - Visualisations - Please provide further (or annotated) visual simulations that show the height of new buildings as enabled in the operative precinct plan.

**Reasons for request H2**

To assist in determining the potential visual/dominance impacts generated by the proposed new development relative to that currently enabled in the operative precinct plan.

**Applicant response provided by**

Rachel de Lambert of Boffa Miskell

**Applicant response**

- 1 Eleven visual simulations have now been prepared to show the development enabled by the operative provisions as well as the proposed heights.
- 2 Four visual simulations are provided showing views to the Former Oakley Hospital Building from viewpoints in Point Chevalier. They are VS6, VS7, VS8 and VS9. These locations have been selected as they best show clear views to the northern frontage of the building with proposed development adjacent and behind. They include two additional visual simulations at the request of Council's landscape architect peer reviewer, refer to the updated set of visual simulations in the Landscape and Visual Effects Graphic Supplement dated June 2023 (issue date 16 June) and updated Assessment of Landscape and Visual Effects dated 3 July 2023.
- 3 No further additional visual simulations have been prepared in respect of this request as visual simulations have already been provided from those locations with the clearest available views.



**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** H3, H4 & H5

**Applicant response provided by** Adam Wild and Veronica Cassin, Archifact and John Duthie, Tattico

**Overview of applicant response**

- 1 This is a combined response for questions H3, H4 and H5 on the Former Oakley Hospital Building.
- 2 Mr Wild and Ms Cassin of Archifact have undertaken a full assessment of the Former Oakley Hospital Building in the context of this plan change. Their report is attached as part of this clause 23 response package. Questions H3, 4 and 5 are fully addressed in the Archifact report. This summary is to assist the Council in referencing that report.

**Specific request H3** Please provide a detailed assessment of effects (including cumulative effects) of the entire PPC on the historic heritage values of the Oakley Hospital Main Building.

Heritage-related AUP RPS objectives and policies, including B2.3.2.(1)(a); B5.2.1.; and B5.2.2.(6-8), are relevant to this assessment. Please also consider within the context of the building's conservation plan<sup>1</sup> and heritage assessment<sup>2</sup>.

**Reasons for request H3** The HIA acknowledges that:

*"...the enabled development will **potentially impact** the heritage values of the former hospital." (p.4) and "...any new buildings, and particularly those of additional height, **will have an impact** on the heritage values of the Former Oakley Hospital." (p.6) (emphasis added).*

However, the level and extent of this impact on the historic heritage values (particularly aesthetic (incl. landmark) and context values) of the Oakley Hospital Main Building and on its overall significance as a Category A historic heritage place, is unclear.

<sup>1</sup> Former Carrington Psychiatric Hospital: A Conservation Plan, prepared by Salmond (now Salmond Reed) Architects, 1995.

<sup>2</sup> Unitec Institute of Technology Former Carrington Psychiatric Hospital: A Heritage Assessment, prepared by DPA Architects, May 2014.

## Responses to Auckland Council RMA cl 23 Requests | H3, H4 & H5 | 2

Furthermore, focus is currently placed on the impact generated by development in Height Area 1, with less mention of impacts (including cumulative impacts) of increased building heights across the precinct, particularly in Height Areas 2 and 4, which are in similarly close proximity to the scheduled place.

### Applicant response

- 1 Mr Wild and Ms Cassin, in their analysis, address the effects of development at length. The report sets out:
  - (a) The methodology used (section 6 of the report).
  - (b) The identification of the place (section 4 of the report).
  - (c) Planning policy (section 5 of the report). This gives an analysis of the heritage aspects of the plan change in terms of the relevant Regional Policy Statement provisions. It compliments clause 23 response P3.
  - (d) Site and context and recent history (sections 7 and 8 of the report).
  - (e) Review of the extent of place and landscape setting (section 9 of the report).
  - (f) Statement of heritage significance (section 10 of the report).
  - (g) Assessment of the heritage effects of this plan change, including an assessment under section D17.8 of the Auckland Unitary Plan (Operative in Part) (*AUP*) (section 11 of the report).
  - (h) The conclusions as to the impact of this plan change and the development enabled under the plan change in terms of the heritage values of the building (section 12 of the report).
- 2 In terms of the heritage values of the building:
  - (a) The Former Oakley Hospital Building and extent of place is protected under the Auckland overlay rules relating to heritage protection and the accompanying schedules. There is no change to those provisions through this plan change.
  - (b) The northern formal landscape gardens of the Former Oakley Hospital Building have been significantly impacted by the historic development of the North-Western Motorway which has severed a large portion of this land with associated changes to access and layout. The remnant gardens are identified as an open space location within the plan change. If there is an effect, it will be to provide a higher level of protection to these areas than the current extent of place classification of the heritage provisions of the AUP.
  - (c) The plan change strengthens the policies on adaptive reuse of heritage and character buildings for retail and other activities. Adaptive reuse is identified as an important method to assist in heritage conservation. The retail provisions already provide for the opportunity for retail floor space within the Former Oakley Hospital Building. The introduction of new Policy 30A simply reinforces this opportunity for heritage restoration through adaptive reuse.

## Responses to Auckland Council RMA cl 23 Requests | H3, H4 & H5 | 3

- 3 The plan change introduces a particular height area adjacent to the Former Oakley Hospital Building. This was considered in the original reports provided by Mr Pearson. A second, independent, heritage opinion was sought as part of these clause 23 responses which is provided in the response by Mr Wild and Ms Cassin in their report.
- 4 The Archifact report addresses these matters in some detail.
- 5 The report's executive summary states:

Overall, the proposed change in height in Height Area 1 adjacent to the west of, but beyond the EOP associated with, the former Oakley Hospital is unlikely to have a significant adverse effect on its historic heritage values.

### Specific request H4

The HIA states (p.5):

*"...locating buildings of additional height in an area in the north west...will result in the least impact on the heritage values to the scheduled building."*

Please explain why this is considered to be the case.

### Reasons for request H4

The location of the buildings of additional height in the site's northwest corner (Height Area 1) means that they will be located adjacent to and viewed within the immediate context of the Oakley Hospital Main Building. Given the proximity of Height Area 1 and the considerable increase in building height sought, it would seem that this location has the potential to result in the greatest (rather than the least) visual impact on the scheduled building's historic heritage values.

It is therefore important to understand what has informed this critical statement.

### Applicant response

- 1 Mr Wild / Ms Cassin address at length the proposal to create a high rise residential opportunity to the south-west of the Former Oakley Hospital Building. This is referenced throughout the report.
- 2 The report states:

Installing large landmark buildings in this location is an appropriate approach considering effects on historic heritage values that can be achieved without causing any change to how the historic heritage place is understood and appreciated.
- 3 The report further states:

## Responses to Auckland Council RMA cl 23 Requests | H3, H4 & H5 | 4

The proposed change to Height Area 1 offers better clarity to the consideration of potential effects of built form (notably height) within the setting of the former Oakley Hospital. The proposed arrangement of the three building sites and their respective maximum heights provides a spatial layering which illustrates how the depth and scale of the development sites, combined with the advantage of the natural and substantial changes in ground level, might allow the historic building to remain appreciable as a prominent feature in the wider townscape context.

The architectural emphasis of the historic former Oakley Hospital Main Building is strongly horizontal and it relies on the open space around it recognised by the defined EOP, specifically to the front as illustrated in view VS6 in commanding its prominent position in the townscape and open space setting. The operative Auckland Unitary Plan (AUP) allows height in this area that surpasses the ridgeline of the historic building. The proposed additional height changes the backdrop to the former Oakley Hospital Main Building, but it would remain nonetheless appreciable as a prominent building within the wider area. The articulation of the open space in the foreground of the Oakley Hospital Main Building could be enhanced to support the development site as a permeable threshold to the local town centre of Point Chevalier.

Overall, the proposed change in height is unlikely to have a substantial effect on the interior shading of the historic building and, in some cases, the effects appear to lessen. The formerly long views from these wards and corridors will become shorter in some locations, but the proposed height increase will not worsen the effects from shading from those generated by the currently operative controls.

**Specific request H5** Please clarify what aspects of the PC are considered mitigating factors from a built heritage perspective.

**Reasons for request H5** The HIA incorporates a section titled 'Mitigating Factors' (p.5), however, it is not entirely clear what these factors are considered to be.

Given the significant changes envisioned by the PPC and the resultant potential for visual dominance effects, it is important to understand what measures are considered to mitigate effects on both the scheduled Oakley Hospital Main Building and the precinct's broader historic landscape.

### Applicant response

- 1 Visual effects are also raised in H3 and H4.
- 2 The Archifact report directly addresses visual effects on the Former Oakley Hospital Building, in particular the report addresses:
  - (a) the location of the greater height zone relative to the heritage features and landscaping to the north of the Former Oakley Hospital Building; and
  - (b) its visibility from key public spaces including Great North Road, Carrington Road and the Point Chevalier town centre.
- 3 The conclusions provided in clause 23 response to H4 equally apply to H5.

## Responses to Auckland Council RMA cl 23 Requests | H3, H4 & H5 | 5

- 4 The Archifact report addresses a series of views of the heritage building in the context of new height controls in the precinct with reference to the visual simulations prepared and assessed as part of the Landscape and Visual Effects Assessment, prepared by Boffa Miskell in 2022 and updated in 2023 as provided in this clause 23 response package. The report describes the effects as:

The operative AUP allows for a tall building mass to the rear of the former Oakley Hospital in both Height Area 1 (to the west of the former Oakley Hospital site) and Height Area 4 (to the north and east). The baseline massing breaks the ridgeline of the historic building and changes its backdrop, but maintains its formal relationship to the north and engaged with its Extent of Place.

- 5 The analysis identifies that the visual simulations that have been prepared demonstrate:

...how the Oakley Hospital Main Building and its space in front remains a primary focus within that viewing context framed behind by the development potential enabled by the operative and Plan Change height and massing provisions. The Plan Change enabled height and massing breaks up and articulates that foil against which the Main Building is read more than the single mass enabled by the operative provisions.

- 6 The executive summary of the Archifact report states:

The proposed change to Height Area 1 offers better clarity to the consideration of potential effects of built form (notably height) within the setting of the former Oakley Hospital. The proposed arrangement of the three building sites and their respective maximum heights provides a spatial layering which illustrates how the depth and scale of the development sites, combined with the advantage of the natural and substantial changes in ground level, might allow the historic building to remain appreciable as a prominent feature in the wider townscape context.

- 7 Visual effects are also assessed in the updated Boffa Miskell Landscape and Visual Effects Assessment and clause 23 response L7.

- 8 With respect to the reference to "mitigation" in the clause 23 request, the application of the matters of discretion, assessment criteria and policies will ensure a high quality of development. In particular, a new Policy 14AA is introduced (refer clause 23 response H7). With this addition, the precinct provisions and the zone / Overlay Heritage provisions of the AUP provide for appropriate development and management of the effects of such development, including around and adjacent to the Former Oakley Hospital Building.

**Proposed Plan Change xx (Private) – Te Auaunga’  
Amending I334 Wairaka Precinct**

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	H6
<b>Specific request</b>	<p>The HIA states (p4):</p> <p><i>"Detailed assessment criteria are proposed to ensure the buildings attain a design standard of high quality. These are found in section 1334.8 Assessment – Restricted Discretionary Activities."</i> and</p> <p><i>"Any new buildings within Height Area 1 should be positioned and orientated having regard to their impact on the heritage values of the Former Oakley Hospital Building."</i></p> <p>Please clarify which assessment criteria have been relied on and if (or how) the provision sought in the HIA has been met.</p>
<b>Reasons for request</b>	<p>Section 1334.8.1.(1A)(b) Assessment – RDA, Matters of Discretion – ‘Building form and character’ provides several assessment criteria, none of which appear to have regard to the effects of the new development on the historic heritage values of the Oakley Hospital Main Building. It is therefore unclear what assessment criteria have been relied upon in the HIA and if they are considered to appropriately safeguard and manage the heritage values of the scheduled building.</p> <p>It is noted that the HIA seeks that new buildings be ‘positioned’ and ‘orientated’ to have regard to their impact on the heritage values of the Oakley Hospital Main building, but this does not appear to have been incorporated into the new precinct provisions. It would be beneficial to understand whether this has a bearing on the HIA findings.</p> <p>Note: See also issue raised below in relation to the sufficiency of the provisions proposed.</p>
<b>Applicant response provided by</b>	Matt Riley, Boffa Miskell; Dave Pearson, DPA Architects; John Duthie, Tattico; and Adam Wild, Archifact

**Applicant response**

1. A new policy I334.3(14AA) is proposed as follows:

Require proposals for new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form.
2. It is also proposed to amend assessment criterion I334.8.2(1B), which relates to assessment of taller buildings in Height Area 1, to include reference to the new policy.
3. This change will enable the relationship (and therefore degree of compatibility) between taller new buildings adjacent to the Former Oakley Hospital Building and the scheduled building to be assessed.
4. This matter is also addressed in response to clause 23 requests H3, H4, H5, H7 and L8 and the report by Archifact attached to this clause 23 response package.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

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**Question** H7

**Specific request** Please explain why reference to the scheduled building has been removed altogether from existing provision I334.3.(14).

**Reasons for request** It is not clear why this reference has been deleted.

Note: See also issue raised below in relation to the sufficiency of the provisions proposed.

**Applicant response provided by** John Duthie of Tattico

**Applicant response**

**Proposed Changes to Policy 14 and the Introduction of Policies 14A and 14AA**

- 1 Policy 14 was amended as per the set of proposed precinct provisions provided with the application materials to focus this policy on the relationship of development with the significant ecological area.
- 2 The requested private plan change has been further amended following the clause 23 requests from the Council.
- 3 This includes a change to Policy 14 and the introduction of a new Policy 14AA to respond to the refocussing of Policy 14 on the significant ecological area relationship and to provide a policy with a particular reference to heritage.
- 4 Policy 14 continues to refer to landscaping treatment adjacent to Te Auaunga.
- 5 A separate policy 14AA relating to heritage buildings is inserted as follows:

Require proposals for new high rise buildings adjacent to the former Oakley Hospital scheduled historic heritage building to provide sympathetic contemporary and high quality design which enhances the precinct's built form

*Reasons*

- 6 Policy 14:
  - (a) The changes to Policy 14 are essentially to promote native plants within landscaping adjacent to Te Auaunga / Oakley Creek.



## Responses to Auckland Council RMA cl 23 Requests | H7 | 2

- (b) This is an important consideration for mana whenua. This plan change seeks to support that by promoting the use of native species in this key landscape and cultural corridor. Te Auaunga / Oakley Creek was an important portage route for Māori. Ensuring that the interface between the precinct and the Te Auaunga valley is appropriately landscaped with native species is reinforced through this policy.

### 7 Heritage:

- (a) The juxtaposition of the Former Oakley Hospital Building and the new development potential for high rise in the north-western corner of the precinct, is addressed in clause 23 responses H4 and H5.
- (b) Mr Wild has undertaken a detailed assessment of this proposal. His report is attached to this clause 23 response package and is referred to in several of the clause 23 responses.
- (c) Mr Wild's analysis carefully examines the appropriateness of locating tall high-rise buildings adjacent to the heritage structure. These responses are also set out in clause 23 response H3, H4 and H5.
- (d) Mr Wild states:

The proposed Height Area 1 is intended to become a marker of the wider northern portion of the site which can be observed from the longer reaches of the western area of the region. The western site edge has dense planting which currently obscures the historic building. The building was not designed to be appreciated from this range and consequently makes only a slight contribution to the area. Installing large landmark buildings in this location is an appropriate approach considering effects on historic heritage values that can be achieved without causing any change to how the historic heritage place is understood and appreciated.

- (e) Mr Wild's report identifies that all the objectives and policies relating to the scheduled heritage building and extent of place as set out in Chapter D17 of the Auckland Unitary Plan (Operative in Part) (*AUP*) apply to this precinct. These provisions manage the effects on heritage of any modifications, alterations or additions to the heritage building and any new buildings or structures within the extent of place.
- (f) Mr Wild concludes:

Policies that support the Objectives include requirements that new buildings be designed in a manner that respects existing buildings, provides for amenity, protects heritage values and, where appropriate, enhances the streetscape and gateway locations of the campuses. Similarly, new buildings or additions to existing buildings adjoining or adjacent to scheduled historic heritage places should be sympathetic and provide contemporary and high-quality design which enhances the historic built form. That is not a requirement however that relies on the form and scale of the historic heritage assets as a baseline for the establishment of height per se.

- (g) The new Policy 14AA recognises (in association with Policy 14A) that new high rise built form and scale is appropriate in this location, and can occur consistently with protecting historic heritage values. The provisions of Policy 14AA provide for the “sympathetic contemporary and high-quality design” of the new high-rise buildings to enhance the precinct’s built form, which includes the Former Oakley Hospital Building.

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**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

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**Question**

H8

**Specific request**

Proposed policy 30A states:

*"Encourage the adaptive re-use of the existing buildings with historic value for retail activity."*

Also relevant is existing Policy 11, which states:

*"Encourage the retention and adaptation of the heritage and character buildings, and elements identified within the precinct."*

Please provide further details about which existing buildings are being referred to here and (in relation to Policy 30A) how their historic value has been/will be determined.

Once identified, please advise what further provisions will be put in place to ensure appropriate outcomes for these buildings (including the Pump House) in the context of the PPC.

**Reasons for request**

There are several existing (late nineteenth and early twentieth century) buildings within the Te Auaunga Precinct that have a strong association with the historical development of the hospital site, contribute to its sense of place, and have potential (or known) historic heritage values. This includes the Pump House (which is understood will be protected via restrictive covenant). These buildings are both broadly and more specifically acknowledged in a number of the PPC supporting and background documentation.

DPA's HIA positively references how "policies are included [in the precinct provisions] to encourage the retention and adaptation of heritage buildings on the site including the Former Oakley Hospital." (p.6)

Boffa Miskell's Assessment of Landscape and Visual Effects goes further by identifying 'key buildings and features' on the site (Figure 4, p.7).

CFG Heritage's Archaeological Assessment (Carrington Backbone Works project) also identifies several historic buildings associated with the early hospital site.

## Responses to Auckland Council RMA cl 23 Requests | H8 | 2

At this stage, the identity of the 'heritage and character buildings' and 'existing buildings with historic value' referred to in the policies are uncertain. To provide greater clarity and avoid confusion in the application of the policies, it would be helpful to have these buildings clearly set out in the precinct plan (in a similar way to trees). There is also the question of whether the objectives, policies and assessment criteria should go further in acknowledging these key features in the precinct's landscape – e.g. Objective (I334.2.(6)); Policy I334.3(4)(i).

**Applicant response provided by** John Duthie, Tattico

### Applicant response

- 1 The question seeks to:
  - (a) identify existing heritage features protected within the precinct; and
  - (b) address "appropriate outcomes" for these buildings.

### Heritage Buildings / Features

- 2 There is only one scheduled heritage building within the precinct and that is the Former Oakley Hospital Building at the northern end of the precinct.
- 3 This is a substantial Category 1 Historic Place listed on the New Zealand Heritage List Rārangī Kōrero.
- 4 The Oakley Hospital Main Building is also scheduled in the Auckland Unitary Plan (Operative in Part) (AUP) Schedule 14: Historic Heritage Schedule (ID1618) and the building and its extent of place are subject to the D17 Historic Heritage Overlay. There is no change to the existing protection of the building afforded through the operative AUP provisions proposed as part of this plan change.
- 5 In addition, in accordance with the resource consent BUN60386270 conditions, the Pumphouse (B33) will be protected by way of covenant. This protection includes the original Pumphouse but excludes the modern annex.
- 6 The Precinct plan could identify the Pumphouse as being subject to a separate covenant if the Council so requests. However, that is not the practice elsewhere in the AUP, and therefore is not proposed.
- 7 The third protected heritage element within the precinct is the stone wall along the southern boundary. This is an archaeological feature protected by covenant with Heritage New Zealand Pouhere Taonga, and also – as with the other archaeological features within the precinct – under the Heritage New Zealand Pouhere Taonga Act 2014. Neither of these features are currently specifically identified and scheduled within the AUP.
- 8 The Precinct plan could identify the stone wall as being subject to a separate covenant, if the Council so requests. However, that is not the practice elsewhere in the AUP, and therefore is not proposed.
- 9 Neither the Pumphouse nor the stone wall warrant protection beyond the standard controls within the Heritage New Zealand Pouhere Taonga Act 2014 or the AUP.

- 10 For completeness, I record that there are no protected or identified heritage buildings within the Unitec campus area. This plan change makes no alteration to that situation, nor would it be appropriate to do so. While the precinct needs to be advanced as one integrated development, effectively the Unitec property is out of scope in terms of any changes promoted as part of this plan change request.
- 11 No changes are proposed to the Precinct plan.
- 12 No other buildings structures, or features are proposed to be protected as part of this plan change request.

**Heritage provisions**

- 13 With respect to the operative AUP provisions and proposed precinct provisions that address the protection of historic heritage:
- (a) The existing objectives and policies are robust and appropriate for the heritage protection of these features.
  - (a) The objectives and policies section of the precinct make it clear that these objectives and policies are in addition to the AUP overlay objectives and policies including part D17: Historic Heritage Overlay.
  - (b) Those objectives and policies have been tested during the original AUP process and found to be appropriate to protect heritage across Auckland.
  - (c) The specific precinct objectives and policies deal with the particular elements relating to this precinct.
  - (d) The adaptive reuse of heritage buildings is a long understood and supported technique. Demonstrably the Former Oakley Hospital Building is not fit for purpose for mental health treatment in New Zealand. In fact, it reflects an era where the knowledge and treatment methods used for mental health are now considered unacceptable. If this heritage building is to be retained, then it requires adaptive reuse.
  - (e) The objectives and policies of this precinct signal the support for adaptive reuse including the opportunity for some retail usage within this building.
  - (f) Equally, the Pumphouse is no longer required for its original purpose. It does not function as part of the Auckland potable water supply. Its protection relies on its adaptive reuse. The objectives and policies provide for this.
  - (g) HUD does not propose any changes to the precinct provisions relating to heritage, as it considers these are fit for purpose.

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**Question**

H9

**Specific request**

It is noted with concern that the proposed plan change provisions give little weight to historic heritage and do not enable greater consideration and assessment to be given to the effects of new development on the historic heritage values of the Oakley Hospital Main Building. – see, for instance I334.3.(14) Policies – Built Form and Character; I334.8.1.(1B) Assessment RDA - Matters of Discretion; I334.8.1.(5)(d)(iv) Assessment RDA - Matters of Discretion; I334.8.2.(1A)(b)(i) Assessment RDA – Assessment criteria and I334.8.2.(1B)(a) Assessment RDA – Assessment criteria.

The Oakley Hospital Main Building is a Category A historic heritage place of outstanding significance well beyond its immediate environs (AUP) and a Category 1 heritage place of special or outstanding historical or cultural significance (HNZPT). It has stood as a distinctive and recognisable landmark in the local landscape for over 150 years. Its landscape qualities are noted in its conservation plan as such:

“The former hospital building is a major local landmark and dominates its immediate setting. It is of regional importance that existing views and the landmark significance of the building remain unaffected by external changes and internal developments.”

Ensuring that the PPC is considered within the context of this significant heritage place and enabling its heritage values to be appropriately protected and managed (as directed in RPS B5. objectives and policies) is therefore considered to be imperative. This cannot be achieved if the precinct provisions neglect to require proposals to be sympathetic to adjacent historic heritage and fail to enable greater consideration and assessment to be given to the relationship between the new development and the Oakley Hospital Main Building.

It is noted that more targeted historic heritage policies and criteria, together with tailored design guidelines, are included in other precincts that enable/have enabled the large-scale (residential) development of sites with heritage values (e.g. Hobsonville Point, Kingseat).

The applicant is encouraged to propose more appropriate provisions to recognise this issue.

**Applicant response provided by** John Duthie of Tattico

**Applicant response**

- 1 This is a non-clause 23 comment.
- 2 The question suggests the plan change “gives little weight to historic heritage”, and does not give consideration to the effects of new development on the heritage building.
- 3 The plan change gives full consideration to the scheduled Former Oakley Hospital Building:
  - (a) The Former Oakley Hospital Building is the only historic heritage place within the precinct scheduled within the Auckland Unitary Plan (Operative in Part) (*AUP*). Its scheduling is unchanged through this process, i.e. there is no change to the heritage provisions or schedules; and there is no change to the ‘*extent of place*’ which applies to the site surrounds.
  - (b) This plan change is not seeking to remove any heritage features or amend any heritage identification including this building’s ‘extent of place’. The Council has set the schedules for protected features and buildings, and what is the appropriate extent of place.
  - (c) Separately two other features within the precinct are, or will be, protected by covenants, being the southern heritage stone wall and the Pumphouse.
  - (d) The same assessment criteria for heritage buildings in terms of objectives, policies, activity classification, and assessment criteria, apply to the Former Oakley Hospital Building as applies to any other Category 1 building within the region.

The plan change is very careful to adopt and incorporate all these provisions.
  - (e) The Auckland Unitary Plan (Operative in Part), through identifying the extent of place, has determined the area in which there should be control of buildings / structures adjacent to the heritage building. This locational extent remains. There is no additional or different development rights sought within the “extent of place”.
  - (f) If the reason for the non-clause 23 comment is related to new development in the area adjacent to the heritage building, that has been extensively addressed in the report by Mr Adam Wild of Archifact. This work was commissioned to give a second opinion to complement the original report done by Mr Pearson of DPA.

The work of Mr Wild is attached to this clause 23 response package.
  - (g) This response should be read in conjunction with response H3, H4, H5 and H7, including reference to a new Policy 14AA included in the updated precinct provisions provided as part of the clause 23 response package addressing the quality of high rise buildings adjacent to the Former Oakley Hospital Building.

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**Question** H10

**Specific request** As the Oakley Hospital Main Building is included on Heritage New Zealand Pouhere Taonga's List as a Category I place (and the precinct likely determined a pre-1900 site), it is considered beneficial to engage with HNZPT (if not already done so) and seek their views at this early stage of the PPC process.

**Applicant response provided by** John Duthie, Tattico

**Applicant response**

- 1 There is ongoing engagement between HUD and Heritage New Zealand Pouhere Taonga (HNZPT) in respect of heritage and archaeological matters within the precinct, including the Former Oakley Hospital Building. As part of this engagement, HNZPT was also provided with a copy of the plan change to consider on 7 March 2023.



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**Question**

H12 – Former Oakley Hospital Main Building

**Specific request**

It is noted that the scheduled Oakley Hospital Main Building is currently unoccupied and due to the lengthy timeframes anticipated for the staged redevelopment of the precinct, there is concern that the building is at risk of vandalism and/or falling into a state of disrepair. Whilst it is acknowledged that the PC has the potential to positively enable new opportunities to support adaptive reuse (including earthquake strengthening), there is no clear understanding of when this might occur. From a good practice conservation standpoint, understanding what commitment has been made to utilise this significant heritage place and safeguard its historic fabric in the short to medium term is important.

**Applicant response provided by**

John Duthie, Tattico

**Applicant response**

- 1 This is a non-clause 23 comment/question.
- 2 The plan change sets up and encourages a range of adaptive reuses of the Former Oakley Hospital Building. That could include residential offices, retail and/or community facilities within the building itself.
- 3 There are significant interdependencies between the timing of this plan change, and the timing of heritage restoration and adaptive reuse. These matters will be worked through between Heritage New Zealand Pouhere Taonga and the Rōpū.

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**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	HH1
<b>Specific request</b>	Please provide a historic heritage assessment that addresses the full plan change area and the actual or potential effects of all forms of development, in particular activities involving land disturbance such as building platforms, roads and tracks, utility connections, retaining structures, fencing and planting.
<b>Reasons for request</b>	<p>The archaeological assessment provided has been prepared in support of previous applications for backbone infrastructure works. This assessment does not assess the full plan change area or proposal.</p> <p>The assessment should specifically refer to the criteria in the AUP's RPS, part B5 (historic heritage) and identify how any adverse effects on any significant historic heritage place/s identified within the proposed plan change area will be managed in accordance with the B5 objectives and policies.</p> <p>Recent reporting should also be drawn from in any updated assessment – i.e.:</p> <ul style="list-style-type: none"> <li>Shakles, R., Burnett, Z. and Farley, G. September 2022. Proposed Residential Subdivision, Wairaka Precinct, Carrington Road, Mt Alert, Auckland: Archaeological Assessment. Prepared for Ngāti Whātua Ōrākei – Whai Rawa by Clough and Associates Ltd.</li> <li>Usher, E. August 2022. Carrington Stormwater Outfall 06: Final Report (HNZPTA Authority 2021/777). CFG Heritage report to Heritage New Zealand Pouhere Taonga, BECA Ltd, The Ministry of Housing and Urban Development and Marutūāhu and Waiohua-Tāmaki Rōpū.</li> </ul> <p>Further, the 1879 field book supporting cadastral plan SO 1992 may also be of use to determine other heritage buildings, features and areas of archaeological potential associated to the Whau Lunatic Asylum (later Carrington Psychiatric Hospital) and Farm (LINZ Recollect – Field Book 0312 pages 0312-039 to 0312-046).</p>
<b>Applicant response provided by</b>	John Duthie, Tattico

### Applicant response

- 1 This plan change is subject to the full Auckland Wide provisions of the Auckland Unitary Plan (Operative in Part) (*AUP*). This includes all heritage matters. It is obviously also subject to the Heritage New Zealand Pouhere Taonga Act 2014, and the protections for archaeological features. The plan change does not seek to modify any of these regulatory controls over development.
- 2 The archaeological assessments provided address the majority of the precinct. Additional assessments are able to be prepared in support of any further land disturbance activities, which will require resource consent and, likely, archaeological authorities.
- 3 The plan change does not increase the area that is available for development – the existing precinct is fully enabled for activities with the potential to disturb the land and subsurface environment, as the precinct is – in its entirety – zoned for either Special Purpose – Tertiary Education, Mixed Housing – Urban, Terraced Housing and Apartment Buildings, Special Purpose – Healthcare Facility and Hospital and Business – Mixed Use. All of these zones enable development that may involve land disturbance, building platforms, roads and tracks, utility connections, retaining structures, fencing and planting, including within the open space areas.
- 4 Any material development (excluding minor additions) triggers a resource consent enabling the Council to determine whether to require a further archaeological assessment.
- 5 The GFC archaeological assessment provides a precinct wide assessment of the Heritage NZ and AC databases and the known history of the precinct. The more detailed inspection relates to the backbone consent. It is not practical, necessary or appropriate to do a full precinct survey over approximately 64ha; particularly given the area is already development-enabled and given the ability to require an assessment as part of future development applications.

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<b>Question</b>	HH2
<b>Specific request</b>	Please provide details of how it is proposed to identify / protect the pre-1900 stone wall (NZAA R11/2979) located along the southern boundary of the plan change area.
<b>Reasons for request</b>	The protection of this feature should be provided for in the plan change.
<b>Applicant response provided by</b>	John Duthie, Tattico
<b>Applicant response</b>	
1	The stone wall along the southern boundary (NZAA R11/2979) is protected by a heritage covenant between Heritage New Zealand – Pouhere Taonga and Ngāti Whātua Ōrākei Whai Rawa. No change to that covenant is proposed through this plan change.

**'Proposed Plan Change xx (Private) – Te Auaunga'  
Amending I334 Wairaka Precinct**

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct

<b>Question</b>	HH3
<b>Specific request</b>	Please provide a copy of the Memorandum of Understanding between Heritage New Zealand and Wairaka Land Company Limited (as agent for Unitec Institute of Technology) regarding the identification, protection and management of cultural and heritage resources within the Wairaka Precinct
<b>Reasons for request</b>	A copy of this document should be provided to council and where relevant evidence also provided outlining any effects arising from the plan change.
<b>Applicant response provided by</b>	John Duthie, Tattico
<b>Applicant response</b>	<p>1 HUD is not a party to the agreement between Heritage New Zealand Pouhere Taonga (<i>HNZPT</i>) and the Wairaka Land Company, had never received a copy of this agreement, and is not bound in any way by this agreement.</p> <p>2 On request from HUD, the Council provided a copy of the agreement to HUD on 1 March 2023 for review. Our review of the agreement shows:</p> <p>(a) Neither HUD, nor the Crown are a party to this agreement.</p> <p>(b) The agreement is irrelevant to this private plan change request and proceedings.</p> <p>3 Notwithstanding that the Crown is not a party to the agreement, the Crown understands that the stone wall referenced in the agreement is an archaeological feature under the Heritage New Zealand Pouhere Taonga Act 2014, that there is a protective covenant between Ngāti Whātua Ōrākei and HNZPT in respect of it, and as such it is protected. That protection is afforded through the legislation and the covenant, and does not rely on any private agreement such as the agreement referenced in this clause 23 request.</p>

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
***Amending I334 Wairaka Precinct***

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** Historic heritage (Archaeology): Non CI23(1) request matter/other comments

**Specific request** Early engagement with Heritage New Zealand Pouhere Taonga is encouraged

**Applicant response provided by** John Duthie, Tattico

**Applicant response**

- 1 This is a non-clause 23 statement by the Council.
- 2 It advises HUD that early engagement with Heritage New Zealand Pouhere Taonga is encouraged.
- 3 HUD is fully aware of the benefits of consultation.
- 4 HUD has been in discussions with Heritage New Zealand Pouhere Taonga, and will continue to do so through this process.

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
*Amending 1334 Wairaka Precinct*

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

P1

**Specific request**

Please clarify the calculation made for potential yield.

**Reasons for request**

Assumed yield enabled by the plan change is important as a basis to then analyse potential effects arising from future development. This includes effects on infrastructure, including transport, open space and community facilities, as well as other community needs such as access to retail and employment. While assumptions for calculating yield have been given (8.1 of the AEE) there is uncertainty about how those assumptions have then been used to arrive at assumed yield.

Please include details of:

1. Total site area over which the analysis has been undertaken
2. What areas have been excluded (m2 of spine roading, m2 of open space, anything else)
3. Define "land efficiency" – what, comprises the 25% excluded.
4. Detail what housing typology mix has been used for the assumptions.
5. Describe, using the areas enabled for housing and the heights proposed, where the assumed housing typology numbers could be applied across the precinct (i.e. breakdown of possible numbers around the precinct).

We would like to see the assessment clearly showing the geographic areas over which the calculations have been applied, ideally corresponding to some sort of table that shows the different ratios and assumptions that have been applied to each stage of the calculation to produce the final dwelling yield. Sufficient information is required to be able to replicate the same calculations on the identified mapped areas and therefore be able to test the sensitivity of the final dwelling yields to the assumptions applied.

An example table is below (containing dummy information) that demonstrates the type of information sought. It should contain a separate row for each area within the precinct which has a different height limit or built height and dwelling typology assumed so that the calculations can be replicated. For example, block A has been split into two areas developed at different densities. Therefore, there it is shown as two separate rows in the table to be able to demonstrate the different densities and yields within each sub-area. I note that this information may be provided slightly differently for horizontally-attached dwellings (e.g. 2-3 level walk-up terraced housing) where individual sections may be first established and then dwellings constructed. This is fine, as long as it contains all of the information to be able to replicate and test the assumptions applied.

Map Area Reference	Typology	Gross Zoned Area (ha)	Developable Area (1) (ha)	Ratio to Parcelled Area (2)	Net Parcelled Area (ha)	Site Cover Ratio (3)	Site Cover (m2)	Height Limit (storeys)	Built Height (storeys)	Total Floorspace (m2)	Av. Dwelling Size (m2)	Est. Dwellings	Av. Land Per Dwelling (net) (m2)
A	Terraced	100	75	80%	60	50%	300,000	3	2	600,000	120	5,000	120
A	Vertically-Attached	20	18	75%	13.5	60%	81,000	6	6	486,000	80	6,075	22
B	Terraced	25	15	80%	12	50%	60,000	3	3	180,000	110	1,636	73
B	Vertically-Attached	30	15	75%	11.25	60%	67,500	8	6	405,000	80	5,062	22
B	Vertically-Attached	35	25	75%	18.75	60%	112,500	8	8	900,000	75	12,000	16

(1) This is the area which has undevelopable areas removed such as larger areas of open space (i.e. those areas that would often have an Open Space zoning in other situations), wetlands, etc.  
 (2) This is a separate ratio, applied subsequently to (1). It is the ratio applied to estimate the share of the developable area that would result in actual privately-owned parcelled area once public roads, reserves, etc have been removed. It is the usual 68%-70% ratio applied to greenfield areas, but realise this will be lower in this case due to the existence of main roads, etc.  
 (3) This is the % of the final parcelled area that is covered by floorspace.

**Applicant response provided by** John Duthie of Tattico

**Applicant response**

- 1 This question effectively seeks a copy of the model used to calculate likely residential yield within the precinct.
- 2 The model is attached to this response. This model has been generated as a planning tool to obtain an overview of possible yield on the site, alongside this plan change. In this regard the following needs to be understood:
  - (a) The model does not reflect the intentions or plans of any of the site developers (the Rōpū of Ngā Mana Whenua o Tāmaki Makaurau). As discussed below, it extrapolates its results from a series of assumptions about potential yield based on land area, the existing and proposed zoning and height areas, typologies and urban form.
  - (b) Each of the site developers are preparing their own development plans which will vary from the model (except to the extent the model incorporates the existing resource consents).
  - (c) The model is not intended to give precise information on any one block. Rather its value is to provide an average development scenario that encompasses the entire development. Specifically, the block layout is for the purpose of assessing yield, and



does not represent any proposed subdivision plan, including as the zoning changes proposed through this plan change will influence the future layout, if confirmed. As land is developed subdivision will occur.

- (d) Each future development proposal will trigger resource consent. At that stage the Council will be able to assess the effects of a specific development, including the impact on infrastructure.
- 3 The basis of the calculations are set out below. The model and index map is attached to this reply. The model follows a similar approach to Council's example, but at a finer grained level.
- 4 The Crown land within the precinct has been broken down into different blocks based on a possible subdivision pattern and topography, solely for the purpose of generating yield assumptions.
- 5 The blocks relate to the attached map. Each block is ascribed a number which corresponds to the left-hand column within the model.
- 6 The model demonstrates a theoretical capacity of 4,618 dwellings. We have then run a density assessment based on each of these blocks.
- 7 The following key assumptions apply to the model:
- (a) For the proposed open space areas identified within proposed Precinct plan 1, there is no residential yield.
  - (b) The Former Oakley Hospital Building is a heritage building. The assessment assumes the conversion of a portion of this building to residential development (the other parts of the building being assumed for other adaptive reuse such as retail and professional offices). However, these assumptions, as with the model as a whole, involve the adoption of generic assumptions that do not represent actual plans.
  - (c) No account is being taken in this calculation of the Mason Clinic. This is a specialist health care facility and is being dealt with through Plan Change 75.
  - (d) No account has been taken of Unitec. This is a specialist tertiary education institute.
  - (e) Both the Crown land and the privately held Ngāti Whātua Whai Rawa blocks are included in the model. These holdings represent the land available for residential and mixed use development within the precinct, according to the current and proposed zoning. As with the rest of the model, the analysis of the Ngāti Whātua Whai Rawa land is a desktop assessment. The Crown has no particular knowledge of the intentions for this land.
  - (f) Three consents under the fast-track system have been granted for this area. The model has been updated to assume the yield as approved under these consents.
  - (g) The model assumes an averaging approach.
  - (h) The model includes the Taylors Laundry site (Sub-precinct B) and assumes this will be developed for residential purposes. This is a likely outcome but only in the longer term, given the property is leased for the medium term.

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- (i) Terrace Housing is based on an average site of 250m<sup>2</sup> gross land area. Assuming a double loaded road / access provision, which delivers about an average 180m<sup>2</sup> net for end and mid-block sites. These assumptions reflect the yield in the granted fast-track consent for terrace housing within the south of the precinct.
  - (j) Land efficiency takes account of the local roading network, infrastructure and potential open space that will be part of the overall subdivision and land development of the land. This is land that will not be part of a private development title.
  - (k) Site efficiency is the percentage of a site that will be developed for building footprint. The remainder of the land is in access, at grade parking, private open space, outlook areas and general landscaping.
  - (l) Building efficiency in apartment buildings is set at 80%. The other 20% is in corridors, vertical circulation space (lifts and stairwells) and services.
- 8 The model assumes 4059 apartments (including walkups) and 559 terrace houses. As discussed above, this does not represent the exact number of dwellings, or proportion of these typologies, that will be developed within the precinct. It provides an approximate measure which has informed the development of the precinct provisions that we propose be created through the plan change.
- 9 The tabulated form of the model is set out below.

Block No.	Land Area (ha)	Land Efficiency		Typology	Average Site Size Terrace (m <sup>2</sup> )	No. Terrace	Site Efficiency		No. Storeys	Building Footprint GFA	Bldg Efficiency		Average Apartment Size (m <sup>2</sup> )	No. Apartments
		%	Land (ha)				%	Area (m <sup>2</sup> )			%	Net GFA (m <sup>2</sup> )		
1*	1.83	-	-	Adaptive Use	-	-	-	7979	2	15958	50%	7979	100	80
2* BLDG 1	0.88	-	-	Apartment	-	-	-	764	19	14516	80%	11613	100	116
2* BLDG 2	-	-	-	Apartment	-	-	-	953	14	13341	80%	10672	100	107
2* BLDG 3	-	-	-	Apartment	-	-	-	953	11	10482	80%	8386	100	84
3A*	0.65	-	-	Apartment	-	-	-	-	-	-	-	-	-	266
3B - 1	1.00	75%	0.75	Apartment	-	-	50%	3750	9	33750	85%	28688	100	287
3B - 2	1.00	75%	0.75	Walkup	-	-	55%	4125	4	16500	85%	14025	100	140
3C	1.27	-	-	Terrace	250	51	-	-	-	-	-	-	-	-
4 - 1	0.40	80%	0.32	Apartment	-	-	50%	1600	7	11200	85%	9520	90	106
4 - 2	0.50	80%	0.40	Walkup	-	-	55%	2200	4	8800	85%	7480	90	83
5* - 1	0.80	75%	0.60	Apartment	-	-	50%	3000	7	21000	85%	17850	100	179
5* - 2	0.82	80%	0.66	Walkup	-	-	55%	3608	4	14432	85%	12267	90	136
6A*	1.13	-	-	Apartment	-	-	-	-	-	-	-	-	-	381
6B - 1	0.55	75%	0.41	Apartment	-	-	50%	2063	6	12375	85%	10519	90	117
6B - 2	0.55	75%	0.41	Apartment	-	-	50%	2063	5	10313	85%	8766	90	97
7*	0.33	100%	0.33	Walkup	-	-	50%	1650	4	6600	85%	5610	90	62
8*	0.39	85%	0.33	Apartment	-	-	50%	1661	7.5	12460	85%	10591	90	118
9A	1.38	-	-	Terrace	250	55	-	-	-	-	-	-	-	-
9C	0.60	85%	0.51	Walkup	-	-	50%	2550	4	10200	85%	8670	90	96
9B	0.60	85%	0.51	Apartment	-	-	55%	2805	7	19635	85%	16690	80	209
10A - 1	0.25	85%	0.21	Apartment	-	-	50%	1063	9.5	10094	85%	8580	90	95
10A - 2	0.28	85%	0.24	Apartment	-	-	50%	1190	7.5	8925	85%	7586	90	84
10B	0.63	85%	0.54	Walkup	-	-	55%	2945	4	11781	85%	10014	80	125
10C	0.62	-	-	Terrace	250	25	-	-	2	-	-	-	-	-
11*	0.48	-	-	Terrace	250	19	-	-	-	-	-	-	-	-
12	0.86	-	-	Terrace	250	34	-	-	-	-	-	-	-	-
13	0.77	-	-	Terrace	250	31	-	-	-	-	-	-	-	-
14	0.95	-	-	Terrace	250	38	-	-	-	-	-	-	-	-
15A	0.60	80%	0.48	Walkup	-	-	55%	2640	4	10560	85%	8976	80	112
15B	0.61	-	-	Terrace	250	24	-	-	-	-	-	-	-	-
16	0.35	100%	0.35	Walkup	-	-	55%	1934	4	7735	85%	6575	100	66
17A - 1	0.75	75%	0.56	Apartment	-	-	50%	2813	7.5	21094	85%	17930	90	199
17A - 2	0.75	75%	0.56	Apartment	-	-	50%	2813	5.5	15469	85%	13148	90	146
17B	1.60	-	-	Terrace	250	64	-	-	-	-	-	-	-	-
17C*	1.40	-	-	Office	-	-	-	-	-	-	-	-	-	-
18	1.42	85%	1.21	Walkup	-	-	55%	6646	4	26582	85%	22595	80	282
19	1.04	75%	0.78	Walkup	-	-	55%	4306	4	17223	85%	14639	80	183
20	1.78	-	-	Terrace	250	71	-	-	-	-	-	-	-	-
21*	3.67	-	-	Terrace	250	147	-	-	-	-	-	-	-	-
22	0.34	85%	0.29	Walkup	-	-	55%	1600	6	9599	85%	8159	80	102
<b>Subtotal</b>	<b>33.83</b>	-	-	-	-	<b>559</b>	-	-	-	-	-	<b>307526</b>	-	<b>4059</b>
23	0.69	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
24	0.98	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
25	0.32	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
26	1.47	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
27	1.64	-	-	Open Space	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>5.10</b>	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>38.93</b>	-	-	-	-	-	-	-	-	-	-	-	-	-

**KEY**

- ADAPTIVE USE
- APARTMENT
- WALKUP
- TERRACE
- OFFICE
- OPEN SPACE

**NOTE:**

- 1\* Height & GFA reflects existing heritage building. Assumes mixed use building
- 2\* Due to the narrower footprint, it is assumed the equivalent of 1 floor is lost in lobbies, service rooms and communal amenity spaces
- 3A\* Adopts existing FTCA consent
- 5\* Site limitation by contour
- 6A\* Adopts existing FTCA consent
- 7\* Assumes business or community use of building
- 8\* Blocks 8 and 9 treated as one development site
- 11\* Assumes retention and adaptive reuse of pump house for business use
- 17C\* Assumes continuation of office use and conference centre
- 21\* Adopts existing FTCA consent and tabled architectural plans
- 22\* Assumes retention of Penman House

For apartments it is assumed half a floor is lost in lobbies, service rooms (infrastructure, waste management bike parking and plant)

Typically, walkups have a higher efficiency at 55% due to factors including reduced parking

Premium apartments offering enhanced outlook have a average GFA of 100sqm

Where in the model different sub numbers are used in the block number e.g. 3B-1, 15B, they refer to a change in typology within the block. They are not bound to a geographic

**Notes**

1. AREAS AND DIMENSIONS SUBJECT TO FINAL SURVEY
2. EASEMENTS TO BE CREATED OVER SERVICES AS NECESSARY

**LEGEND**

- OPEN SPACE/ RESERVE
- NGĀTI WHĀTUĀ RŌPŪ LOTS
- WHAI RAWA LOTS
- WAIOHUA - TĀMAKI RŌPŪ LOTS
- MARUTŪĀHU RŌPŪ LOTS
- ROAD WIDENING PARCELS
- PROPOSED FUTURE ROAD PARCEL
- NEW BOUNDARIES
- EXISTING LINZ XML BOUNDARIES



**FOR INFORMATION  
NOT FOR CONSTRUCTION**

No.	Revision	By	Chk	Appd	Date
J	POND BOUNDARY UPDATE SECTION 3 AND 4	AH	AH	NG	14/02/23
I	STRAIGHTENED BOUNDARIES SECTION 3 AND 4 AND UPDATED AREAS	CG	AH	NG	31/01/23
H	UPDATED BOUNDARIES SECTION 3 AND 4	AH	AH	NG	21/12/22
G	UPDATED BOUNDARIES SECTION 8	AH	AH	NG	20/12/22

Drawing Originator:



Original Scale (A1)	1:1500	Surveyed	KM	06/2022	Approved For Issue*
Reduced Scale (A3)	1:3000	Drawn	AH	06/2022	Date
		Verified	NG	06/2022	
		Diag Check	NG	06/2022	

\* Refer to Revision 1 for Original Signature

Client: **MINISTRY OF HOUSING AND URBAN DEVELOPMENT (HUD)**

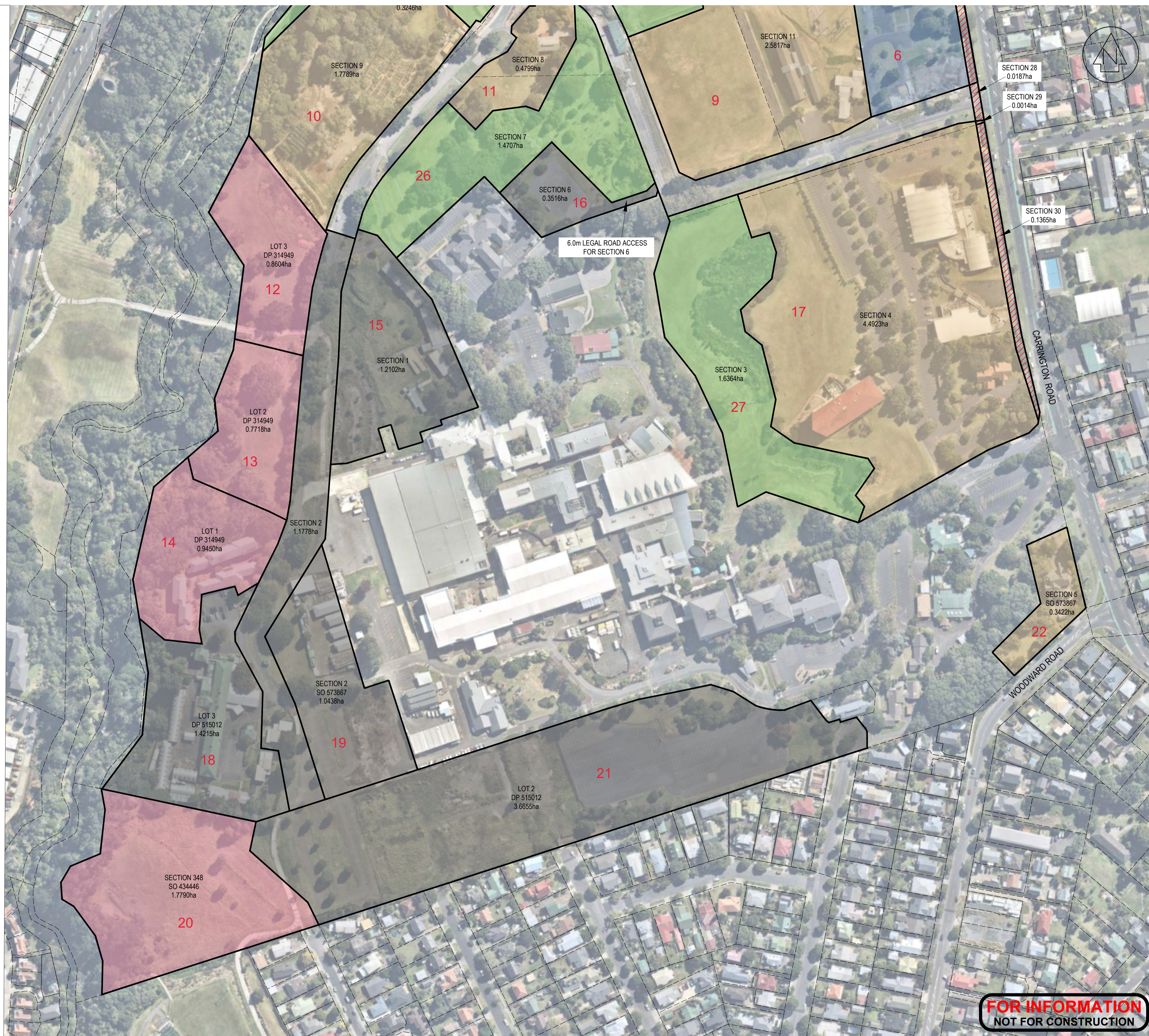
Project: **CARRINGTON SUBDIVISION**

Title: **SCHEME PLAN 2 INCLUDING ROAD WIDENING**

Discipline	SURVEY	
Drawing No.	3126781-WS-003	Rev.
		J

### Notes

1. AREAS AND DIMENSIONS SUBJECT TO FINAL SURVEY
2. EASEMENTS TO BE CREATED OVER SERVICES AS NECESSARY



### LEGEND

- OPEN SPACE/ RESERVE
- NGĀTI WHĀTUĀ RŌPŪ LOTS
- WHAI RAWA LOTS
- WAIOHUA - TĀMAKI RŌPŪ LOTS
- MARUTŪĀHU RŌPŪ LOTS
- ROAD WIDENING PARCELS
- PROPOSED FUTURE ROAD PARCEL
- NEW BOUNDARIES
- EXISTING LINZ XML BOUNDARIES

FOR INFORMATION  
NOT FOR CONSTRUCTION

No.	Revision	By	Chk	Appd	Date
J	POND BOUNDARY UPDATE SECTION 3 AND 4	AH	AH	NG	14/02/23
I	STRAIGHTENED BOUNDARIES SECTION 3 AND 4 AND UPDATED AREAS	CG	AH	NG	31/01/23
H	UPDATED BOUNDARIES SECTION 3 AND 4	AH	AH	NG	21/12/22
G	UPDATED BOUNDARIES SECTION 8	AH	AH	NG	20/12/22



Original Scale (A1)	Surveyed	Drawn	Verified	Checked	Approved For Issue*
1:1500	KM	06/2022	AH	06/2022	Date
Reduced Scale (A3)	Diag Check	NG	06/2022		
1:3000	* Refer to Revision 1 for Original Signature				

Client: **MINISTRY OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Project: **CARRINGTON SUBDIVISION**

Title: **SCHEME PLAN 2 INCLUDING ROAD WIDENING**

Discipline	Drawing No.	Rev.
<b>SURVEY</b>	<b>3126781-WS-002</b>	<b>J</b>

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
*Amending I 334 Wairaka Precinct*

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question** P2

**Specific request** Summary of community consultation outcomes

**Reasons for request** It is understood the Applicant is undertaking local community consultation. It will be helpful to have information on the outcomes of that consultation.

**Applicant response provided by** John Duthie of Tattico

**Applicant response**

In addition to the Albert-Eden Local Board and stakeholder consultation outlined in the application, HUD has undertaken the following community consultation.

**Public Drop in Sessions**

- 1 Drop-in sessions were held in February 2023. Two sessions were held two weeks apart with a 3pm to 7pm timeframe. The time spread was intended to provide an afternoon and / or evening opportunity for people to visit the precinct, to question the HUD's consultant team, and to view a summary of the plan change material, including the Precinct plans. This also included information in respect of the existing precinct provisions and plans for comparison.
- 2 Approximately 25-30 members of the community attended on the first drop-in session, with around 50-60 attending the second session.
- 3 A broad range of the community attended including:
  - (a) residents;
  - (b) people who worked in the area;
  - (c) people studying in the area;
  - (d) people with children at primary schools in the area;
  - (e) local business owners;
  - (f) people coming on behalf of public interest groups; and
  - (g) Local Board members.
- 4 The key themes raised are set out below.

5 *Transport:*

- (a) Traffic to and from the south and how this would be controlled to prevent through traffic in residential streets / the maintenance of the existing cul-de-sacs in the southern section of the development.
- (b) Volumes of cars and the effects of increased traffic in surrounding streets.
- (c) Integration with Auckland Transport's (AT) Carrington Road upgrade.
- (d) Related upgrades and whether these were planned, including the Woodward Road Railway Crossing.
- (e) Roding connectivity to and from the east, i.e. integration between the precinct and Mount Albert streets on the other side of Carrington Road.
- (f) The feasibility of extending the Carrington Road upgrade east of Woodward Road (narrower corridor, steeper land adjacent) and how the rail and motorway overbridge pinch points would be dealt with.
- (g) Concern about parking in surrounding suburbs by residents of the new "low car" development and whether a residents' parking scheme would be supported by AT.
- (h) Support for the alternative expanded cycleway network and connections to the Northwestern and Southern Cycleway to Mount Albert. Higher density considered to be supported by this network.
- (i) Support for the cycling initiatives in the plan change.
- (j) Questions about the new connection to the Northwestern Cycleway in light of the proposed connection, as shown on the operative Wairaka Precinct plans, being removed through the Mason Clinic plan change.
- (k) Support for provision of public walking through the precinct and connectivity to the surrounding neighbourhoods.

6 *Business – Mixed Use zone:*

- (a) The type of expected development e.g. housing typologies, the anticipated mix between public, affordable and market housing, the potential for a large number of apartments.
- (b) Provision of a masterplan.
- (c) Questions regarding whether there would be enough retail and hospitality provision for the local community, or would the future residents need to drive to services. Members of the community supported walkable opportunities for base convenience retail e.g. supermarket, dairy, hairdresser etc. without having to get in a car.
- (d) Interest by residents in the surrounding community in respect of accessing – via walking / non-car based mobility – retail and hospitality venues provided within the new community BMU. Noted loss of recent access to local dairy / walkable retail amenity.

(e) Questions about the future of Taylor's Laundry.

7 *Stormwater:*

(a) Retention, detention and attenuation including how much on-site management of stormwater was anticipated.

(b) January storm events and impacts across the precinct.

(c) Effects on the neighbouring area including to the eastern side of Carrington Road (noting this is a different catchment).

(d) Whether there are sufficient pervious areas planned within the precinct.

8 *Open Space and Community Facilities:*

(a) Type and extent of open space.

(b) Whether public or private.

(c) Interest in any plans around community facilities.

(d) Sanctuary gardens – what will happen to them.

9 *Trees:*

(a) Protection for trees in the plan.

10 *Height:*

(a) Permitted heights across the precinct, particularly along the Carrington Road frontage.

(b) Impact of Plan Change 78 and nature of change / further development opportunity in the surrounding residential area.

11 *Timing of the development:*

(a) Timing of development, including interest in seeing development progress to help bring a future community to support the Point Chevalier town centre and its retailers.

(b) Timing of Carrington Road upgrades.

(c) Interest in opportunities to buy dwellings for themselves or family members.

12 *Former Oakley Hospital Building and Heritage:*

(a) Interest in Building 1 (the Former Oakley Hospital Building) and its future.

(b) Request for the Pumphouse to be returned to a publicly accessible operating café / bar / restaurant.



13 *School:*

- (a) Whether a primary school is planned within the precinct and whether it could be added later if not included now.

14 *Housing tenures:*

- (a) Future home ownership tenures i.e. who will own the land, will it be leasehold, will there be public housing, will there be many rentals.
- (b) Support for “rent to buy” possibilities.

15 HUD considers that the relevant matters raised at these sessions have been comprehensively addressed in the plan change application materials and clause 23 responses.

#### **The Tree Council**

16 HUD met separately with The Tree Council and a copy of the relevant parts of the plan change (i.e. the protected tree schedule) were provided. The Tree Council wanted assurance that the plan change was not altering the level of protection in the Auckland Unitary Plan (Operative in Part) (*AUP*) for either the identified trees in the precinct or the notable trees in the AUP. This assurance was given.

17 The Tree Council was also keen for future public space areas to encompass significant trees (as is the case with the notable trees, a proposal which they were supportive of).

#### **Unitec’s Ngā Kaitiaki Committee**

18 Discussions were held with Unitec’s Ngā Kaitiaki Committee, which comprises a mix of Unitec staff and student representatives – primarily those associated with Unitec’s Te Noho Kotahitanga Marae, as well as some community representatives.

19 Discussions were had about the precinct name (with support for leaving it as “Wairaka”), the future of the Former Oakley Hospital Building, height controls, and biodiversity. The group requested the opportunity to walk around the precinct and discuss key locations identified in the plan change locations, which was agreed by HUD and occurred on 25 May 2023.

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
*Amending I 334 Wairaka Precinct*

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	P3
<b>Specific request</b>	Please provide an analysis of the proposed plan change in relation to AUP RPS chapters B3 – Infrastructure, Transport and Energy; B4 - Natural heritage; B5 – Built heritage and character; B6 Mana Whenua; B7 Natural Resources; B8 Coastal Environment and B10 Environmental Risk.
<b>Reasons for request</b>	Required for a full understanding of the proposed plan change under the RPS.
<b>Applicant response provided by</b>	John Duthie of Tattico
<b>Applicant response</b>	
1	As stated in the plan change application, the plan change will give effect to the Regional Policy Statement, as required by s 75(3).
2	The attached table sets out the requested assessment of the plan change against chapters B3-B8 and B10 of the Regional Policy Statement.

RPS Chapter and provisions	Assessment in respect of plan change
<b>B3 Ngā pūnaha hanganga, kawekawe me ngā pūngao – Infrastructure, transport and energy</b>	
<p><b>B3.2 Infrastructure</b></p> <p><b>B3.2.1 Objectives</b></p> <p>(1) Infrastructure is resilient, efficient and effective.</p> <p>(2) The benefits of infrastructure are recognised, including:</p> <ul style="list-style-type: none"> <li>(a) providing essential services for the functioning of communities, businesses and industries within and beyond Auckland;</li> <li>(b) enabling economic growth;</li> <li>(c) contributing to the economy of Auckland and New Zealand;</li> <li>(d) providing for public health, safety and the well-being of people and communities;</li> <li>(e) protecting the quality of the natural environment; and</li> <li>(f) enabling interaction and communication, including national and international links for trade and tourism.</li> </ul> <p>(3) Development, operation, maintenance, and upgrading of infrastructure is enabled, while managing adverse effects on:</p> <ul style="list-style-type: none"> <li>(a) the quality of the environment and, in particular, natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character;</li> <li>(b) the health and safety of communities and amenity values.</li> </ul> <p>(4) The functional and operational needs of infrastructure are recognised.</p>	<ol style="list-style-type: none"> <li>1. Development enabled by the plan change will be integrated, as far as possible, with the network infrastructure upgrades planned in this part of the city. However, as there was originally the possibility for some misalignment in the timing of the Carrington Road upgrades, the Crown has funded Auckland Transport to complete this upgrade for dedicated walking, cycling and public transport connections, which will now be delivered in good time (between 2025 and 2027) to ensure public transport and alternative modes are available as the new community is establishing.</li> <li>2. The current major wastewater upgrade Watercare is undertaking, through building of the Central Interceptor, and the effect of this in terms of wastewater infrastructure capacity effectively provides a resilient wastewater network on its forecast completion in 2026.</li> <li>3. Other network infrastructure upgrades will also benefit this development, particularly Watercare’s Sutherland Bulk Supply Point (potable water), and the City Rail Link. The Sutherland bulk water supply is within the Watercare AMP and budgeted for completion within the next few years (currently 2024, but not critical to this project until later). The City Rail Link will enhance public transport options particularly for residents in the southern part of the precinct.</li> <li>4. There is no impact on regional infrastructure. The primary regional infrastructure through the precinct is the Ōrākei Main which is not impacted by this plan change.</li> </ol>

RPS Chapter and provisions	Assessment in respect of plan change
<p>(5) Infrastructure planning and land use planning are integrated to service growth efficiently.</p> <p>(6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.</p> <p>(7) The national significance of the National Grid is recognised and provided for and its effective development, operation, maintenance and upgrading are enabled.</p> <p>(8) The adverse effects of infrastructure are avoided, remedied or mitigated.</p>	<p>5. The key natural resource is the Te Auaunga stream (Oakley Creek) and the protected trees within the precinct. This plan change retains the additional yard setback of 10m to Oakley Creek as required under the current Precinct provisions. This is designed to enhance protection of the Te Auaunga stream environs. The plan change also retains the same list of protected trees.</p>
<p><b>B3.3 Transport</b></p> <p><b>B3.3.1 Objectives</b></p> <p>(1) Effective, efficient and safe transport that:</p> <p>(a) supports the movement of people, goods and services;</p> <p>(b) integrates with and supports a quality compact urban form;</p> <p>(c) enables growth;</p> <p>(d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and</p> <p>(e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.</p>	<p>1. Consistent with the above response in relation to infrastructure, effective, efficient and safe transport will be provided in an integrated manner, in accordance with the precinct provisions proposed in the plan change.</p> <p>2. The precinct is uniquely located in terms of the walkway and cycleway network, bus network, and, particularly for the southern portion of the precinct, access to trains.</p> <p>3. The transport links, across several modes and improving with the planned upgrades, between the Mount Albert and Point Chevalier town centres assists in the integration between these two growth nodes.</p> <p>4. As a result, the plan change, and development enabled by it, will provide significant transport choices.</p>
<p><b>B4 Te tiaki taonga tuku iho - Natural heritage</b></p>	
<p><b>B4.2 Outstanding natural features and landscapes</b></p>	<p>1. There are no outstanding natural features or landscapes within the precinct.</p>
<p><b>B4.3 Viewshafts</b></p> <p><b>B4.3.1 Objectives</b></p>	<p>1. Existing viewshafts over the precinct are protected by the Auckland Unitary Plan (Operative in Part) (AUP) overlay provisions.</p> <p>2. There is no change to these provisions through this plan change.</p>

RPS Chapter and provisions	Assessment in respect of plan change
<p>(1) Significant public views to and between Auckland’s maunga are protected from inappropriate subdivision, use and development.</p> <p>(2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.</p>	<p>3. No height standard proposed through the plan change will impinge on any existing viewshaft.</p> <p>4. This plan change fully protects the volcanic viewshaft that crosses the southern part of the precinct.</p>
<p><b>B4.5 Notable trees</b></p> <p><b>B4.5.1 Objectives</b></p> <p>(1) Notable trees and groups of trees with significant historical, botanical or amenity values are protected and retained.</p>	<p>1. There are no changes to notable trees as part of this plan change.</p> <p>2. The Council has recently reviewed the tree schedule within the region. This culminated in Proposed Plan Change 83 (<i>PC83</i>) looking at notable trees.</p> <p>3. PC83 proposed to amend the description of the only notable group of trees in the precinct (ID 173) from 6 to 5 trees. HUD has made no comment on this plan change as it accepted the Councils changes.</p> <p>4. However, due to a notification error, this amendment has been withdrawn from PC83 and we understand will be included in a subsequent Council plan change.</p> <p>5. The withdrawal of the proposed amendment has no effect on the plan change.</p> <p>6. In addition to the notable trees, the precinct provides a schedule of specifically protected trees. Again there is no change to those provisions as part of this plan change.</p> <p>7. This plan change is consistent with the regional policies on notable trees.</p>
<p><b>B5 Ngā rawa tuku iho me te āhua – Historic heritage and special character</b></p>	
<p><b>B5.2 Historic heritage</b></p> <p><b>B5.2.1 Objectives</b></p>	<p>1. Heritage protection is provided through the overlay provisions within the AUP. In particular, these provisions identify the Former Oakley Hospital Building as a protected heritage building.</p>

RPS Chapter and provisions	Assessment in respect of plan change
<p>(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.</p> <p>(2) Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.</p>	<p>2. There is no change to the protection of this building or its extent of place as part of this plan change.</p> <p>3. There are no changes to any of the heritage or character provisions or operative precinct provisions that encourage the retention and adaptation of the Former Oakley Hospital Building.</p> <p>4. In addition, a new policy is proposed in the precinct provisions through the plan change to encourage adaptive re-use of existing buildings with historic value for retail activities.</p>
<b>B6 Mana Whenua</b>	
<p><b>B6.2 Recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation</b></p>	<p>1. This chapter of the Regional Policy Statement sets out a series of objectives and policies relating to partnership with mana whenua.</p> <p>2. Fundamentally, this plan change is supporting the provision of Treaty redress in part settlement of historical Treaty of Waitangi grievances by the Crown, as set out in the provisions of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed and Act which contain the terms which underpin this plan change proposal. It, therefore recognises Treaty of Waitangi/ te Tiriti o Waitangi partnerships and participation.</p> <p>3. As the development will be undertaken by the iwi collectives (Rōpū), its outcomes will reflect their participation in urban development, in partnership with the Crown.</p>
<p><b>B6.3 Recognising Mana Whenua values</b>  <b>B6.4 Māori economic, social and cultural development</b>  <b>B6.5 Protection of Mana Whenua cultural heritage</b></p>	<p>1. These objectives are all directly related and relevant to this plan change.</p> <p>2. Particular objectives and policies are introduced into the plan change which promote Māori economic development and the cultural values of this land.</p>

RPS Chapter and provisions	Assessment in respect of plan change
	<ol style="list-style-type: none"> <li>3. This plan change enables the three Rōpū comprising 13 iwi to advance their own economic development aspirations and to do this in a manner which protects and enhances their cultural values for this place.</li> <li>4. This plan change is fully consistent with, and gives effect to, these regional objectives. In particular, it has been drafted to support Rōpū aspirations for the precinct, and the proposed provisions have been agreed with them.</li> </ol>
<b>B7 Toitū te whenua, toitū te taiao – Natural resources</b>	
<p><b>B7.2 Indigenous biodiversity</b></p> <p><b>B7.3 Freshwater systems</b></p>	<ol style="list-style-type: none"> <li>1. The natural resource provisions are reflected in the Auckland-wide provisions of the AUP. This plan change does not seek any changes to these Auckland-wide provisions.</li> <li>2. The operative precinct adopts in full all the objectives, policies, rules and assessment criteria of the Auckland-wide provisions, and this is not proposed to be changed through this plan change.</li> <li>3. In that regard, this plan change is fully consistent with the Regional Policy Statement by virtue of adopting the Auckland-wide provisions of the AUP.</li> </ol>
<b>B8 Toitū te taiwhenua – Coastal environment</b>	
	<ol style="list-style-type: none"> <li>1. The precinct is not on the coast and therefore does not directly relate to these policies. The regional and Auckland wide policies on Water quality and land disturbance provide appropriate methods to manage the effects of development and the impact on the coastal environment. These policies and related provisions are all applicable with in the precinct. This plan change does not seek to alter any of those provisions.</li> </ol>

RPS Chapter and provisions	Assessment in respect of plan change
<b>B10 Ngā tūpono ki te taiao - Environmental risk</b>	
<p><b>B10.2 Natural hazards and climate change</b></p> <p><b>B10.3 Land – hazardous substances</b></p> <p><b>B10.4 Land – contaminated</b></p>	<ol style="list-style-type: none"> <li>1. The Regional Policy Statement addresses natural hazards and climate change, land hazardous substances, land contaminated, and genetically modified organisms.</li> <li>2. The provisions which flow from these objectives are set out in the Auckland-wide objectives, policies and rules of the AUP.</li> <li>3. The precinct fully adopts those Auckland-wide provisions. It does not seek to delete or change any objective, policy, method or assessment criteria relating to environmental risk.</li> <li>4. There are no known natural hazards that apply to the precinct.</li> <li>5. There are overland flow paths that traverse through the precinct. These are fully addressed in the Stormwater Management Plan for the precinct which has been adopted by Council. This demonstrates how stormwater management and localised flooding and overland flow is to be managed on site.</li> <li>6. Significant portions of this work are well advanced. This includes works consented and delivered including the daylighting of the Wairaka Stream, and Outfall 6.</li> <li>7. In addition, the Mason Clinic development is advancing the management of certain overland flows and stormwater in the northern portion of the precinct.</li> <li>8. The land does have isolated pockets of historical land contamination.</li> </ol>



RPS Chapter and provisions	Assessment in respect of plan change
	<p>9. For the central and northern portion of the precinct, a global land contamination consent has already been obtained. This sets up the process to monitor and manage these effects. The process for investigation and management of any contaminants is set out within that consent.</p> <p>10. Areas of land not covered by this global land contamination consent, are subject to separate applications under the Auckland-wide provisions as addressed in clause 23 response P7.</p> <p>11. Any hazardous substances stored on site within the precinct would be subject to the objectives, policies, rules and standards of the relevant Auckland-wide provisions.</p> <p>12. In terms of environmental risk, the regional objectives and policies are embodied in the Auckland wide provisions. These provisions are adopted in full within this precinct. There are no environmental risk features inherent to this precinct that warrant provisions beyond the Auckland wide controls.</p>

**'Proposed Plan Change xx (Private) – Te Auaunga'**

*Amending I 334 Wairaka Precinct*

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	P4
<b>Specific request</b>	Please provide an analysis of the proposed plan change in relation to any applicable iwi management plan.
<b>Reasons for request</b>	Required for a full understanding of the proposed plan change in relation to any relevant iwi management plan.
<b>Applicant response provided by</b>	John Duthie, Tattico

**Applicant response**

- 1 While iwi management plans have been produced, at various times, for the Wairaka Precinct there are no iwi management plans that apply specifically to this plan change.
- 2 While this plan change has been put forward by HUD, it is in the context of Treaty settlement obligations that apply to the Crown over the site, which were agreed as part of the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed arrangements. As part of those arrangements, the Crown is working closely with the three Rōpū parties to the Collective Redress Deed: Marutūāhu, Ngāti Whatua and Waiohua-Tāmaki who will take ownership of the land and undertake development, in partnership with HUD. The thirteen iwi constituting those three Rōpū are:

*Marutūāhu Rōpū:*

- (a) Ngāti Maru.
- (b) Ngāti Pāoa.
- (c) Ngāti Tamaterā.
- (d) Ngaati Whanaunga.
- (e) Te Patukirikiri.

*Ngāti Whātua Rōpū:*

- (f) Ngāti Whātua Ōrākei.
- (g) Te Rūnanga o Ngāti Whātua.
- (h) Ngāti Whātua ki Kaipara.

*Waiohua-Tāmaki Rōpū:*

- (i) Ngāi Tai Ki Tāmaki.
  - (j) Ngāti Tamaoho.
  - (k) Ngāti Te Ata.
  - (l) Te Ākitai Waiohua.
  - (m) Te Kawerau ā Maki.
- 3 Two other groups are identified in the Auckland Council database as having an interest in this land, Te Ahiwaru (Makaurau Marae) and Waikato-Tainui. Both those additional groups have been written to but, given the Treaty settlement context noted above, comments have not been received and are not expected.
- 4 The HUD consultation has been with the three Rōpū and the representatives of the iwi.
- 5 All of the Rōpū have been consulted over the details of the plan change and have supported it. All cultural elements have been built into this plan change with their support. Each will bring their individual cultural perspectives to the development.

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
*Amending I 334 Wairaka Precinct*

**Applicant:** Minister of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	P5
<b>Specific request</b>	Please provide an analysis of the proposed plan change in relation to the Auckland Council Ten Year Budget / Long Term Plan 2018-2028
<b>Reason for request</b>	Required for a full understanding of the proposed plan change in relation to the demands of development enabled by the plan change and what is / what is not provided for in Council's LTP.
<b>Applicant response provided by</b>	John Duthie, Tattico
<b>Applicant response</b>	
1	The question relates to funding of infrastructure and how this plan change relates to Council's planned expenditure.
2	While the question is confined to the Council's Long Term Plan ( <i>LTP</i> ) (noting that the current LTP is for 2021-2031), Auckland Transport's ( <i>AT</i> ) funding plan (Regional Land Transport Plan 2021-2031) and Watercare's funding plan 2021-2031 are also relevant to funding of infrastructure required to service the precinct.
3	The LTP's most significant budget centre is for the funding of transport functions into AT.
4	Watercare are self-funding necessary infrastructure through its user-pays regime.
5	The Crown's funding of the Carrington Road upgrades and the funding of the cycle lane extensions within the precinct means that this development will have some, but a proportionally low, regional impact on transport funding through the existing LTP. Rather, the proposed development has facilitated a funding stream to pay for a major regional project that will help enable intensification within this part of the city - being the Carrington Road upgrade.
6	An assessment of the different types of network infrastructure required to service the precinct and relevant funding streams is set out in the table below.

Network infrastructure	Funding scenario	Relevant services
<p><b>Transport</b></p> <p>Core regional transport infrastructure relating to public transport, funded through Council's LTP</p>	<p>To the best of HUD's knowledge, the bus and train services the plan change relies upon are either already funded, with that funding due to continue, or in some cases service levels are due to be enhanced. This is particularly the case for the rail corridor with the opening of the City Rail Link (CRL).</p> <p>The Crown has provided \$113.2 million for the Carrington Road upgrade, which AT nominated as the budget for an upgrade for its full length (Great North Road to New North Road).</p> <p>Presumably when the Council and AT next update the LTP and AT funding plans, it will factor in both the funding, and timing of the works, for the Carrington Road upgrade. However, regardless of what appears in the plans, the Crown has funded the work to AT's estimates on budget and it is for the Council to now manage and deliver the project. Funding is no impediment to delivery.</p>	<p>Development of the precinct as enabled by the plan change will rely on a high quality public transport system. The Carrington Road corridor is well serviced by the Link service at good frequency. Other bus services in the Great North Road corridor, and the train services through the Mt Albert and Baldwin Road stations, provide important public transport connections for the northern, central, and southern parts of the precinct. These include northern services to Great North Road and Point Chevalier, western services (and some southern) across the Waterview overbridge to Great North Road, central, eastern and some southern services to the Carrington Road services and the train stations).</p> <p>Carrington Road widening for public transport and alternative modes is a major upgrade which for some time has been in the Regional Land Transport Strategy but deferred due to budgetary constraints. \$55 million was allocated in the previous Regional Land Transport Strategy.</p>
<p><b>Transport</b></p> <p>Core regional transport infrastructure relating to walking and cycling funded through Council's LTP</p>	<p>The plan change will deliver an additional, separated, dedicated cycling link between Mount Albert / the Waterview Shared Path and the Northwestern Cycleway, through the precinct, as well as dedicated cycling links East/West between the Oakley Creek overbridge and Carrington Road. There is no cost to either the AT or Auckland Council funding plans from these works.</p>	<p>The land benefits from being close to the junction of the Northwestern Cycleway and the Waterview Shared Path which connects to the Mount Albert cycleway.</p>

Network infrastructure	Funding scenario	Relevant services
<p><b>Wastewater</b></p> <p>Funded through Watercare’s budget and Infrastructure Growth Charges (IGC)</p>	<p>The Central Interceptor is fully funded through Watercare budgets and well into construction (due to complete in 2026).</p> <p>IGCs will be paid by the development, part of which will be a contribution towards the cost of that work.</p> <p>Wastewater requirements will have no impact on the Council LTP and, in terms of Watercare’s network, the project will be a contributor through IGCs to the upgrade of wastewater and water supplies.</p>	<p>The wastewater servicing of the precinct in the middle and latter stages relies on the completion of the Central Interceptor that is forecast to be complete by the end of 2026.</p> <p>The assessment criteria within the Auckland Unitary Plan (Operative in Part) make it clear that each subdivision must be capable of being serviced by wastewater infrastructure.</p>
<p><b>Water</b></p> <p>Funded through Watercare’s budget and IGCs</p>	<p>Water infrastructure upgrade costs are within the Watercare budget and so are available to fund the Sutherland Bulk Supply Point (BSP) upgrade.</p> <p>The proposed works by Watercare will change the location of the main water supply to the precinct to free up demand for other developments outside the precinct.</p> <p>The necessary extension and upgrade to public water mains connecting the project to the Sutherland BSP will be funded through the development enabled by the plan change.</p> <p>IGCs from the development enabled by the plan change will also contribute to the funding for the BSP infrastructure.</p> <p>This will have no impact on the Council’s LTP.</p>	<p>Water servicing of the precinct is subject to an upgrade to the Sutherland BSP.</p>

Network infrastructure	Funding scenario	Relevant services
<p><b>Open space</b></p> <p>Funded through the LTP</p>	<p>HUD has been in discussions with Council officers in relation to the funding of open space and understands from these discussions that:</p> <p>There is no particular allowance within the LTP for open space purchases within the precinct. However, there are general budget allocations that could be used to fund the neighbourhood park acquisition.</p> <p>There is a significant uplift in housing yield that will generate additional income into the development contributions open space budget, and should therefore enable Council to complete the open space purchases.</p>	<p>This development provides 5.1ha of open space or 15% of the HUD land area.</p> <p>The Mason Clinic provides for its own open space internally given the nature of their facility.</p> <p>Unitec has its facilities within its own campus area.</p>
<p><b>Community facilities</b></p> <p>Funded through the LTP</p>	<p>There is a significant uplift in housing yield that will generate additional income into the community facilities budget, and should therefore enable Council to invest in community facilities either within the precinct or in the vicinity.</p>	<p>There are no public community facilities provided as part of this development directly. The plan change and underlying zoning enables community facilities. Facilities necessary to serve the community may develop within the precinct over time given the enabling framework.</p>

**'Proposed Plan Change xx (Private) – Te Auaunga'**  
*Amending I334 Wairaka Precinct*

**Applicant:** Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	P6
<b>Specific request</b>	Please provide an analysis of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020.
<b>Reasons for request</b>	Required for a full understanding of the proposed plan change in relation to the Albert-Eden Local Board Plan 2020.
<b>Applicant response provided by</b>	John Duthie, Tattico

**Applicant response**

- 1 The Local Board Plan 2020 (*Local Board Plan*) has six key outcomes. The response below explains how the plan change makes a contribution to each of these outcomes.

**Outcome 1: resilient connected and empowered communities who value diversity**

- 2 Spatially, and in its objectives, the plan change is intended to ensure that the future community is connected into the adjacent neighbourhoods of Mount Albert, Point Chevalier and Waterview. This is realised both practically through the roads, walking and cycling paths that are updated through the plan change to reflect the extended network being built, and in provisions that recognise the need for a variety of community facilities and opportunities for the community to socialise, work, undertake learning, and recreate within the precinct, as well as acknowledging the hierarchy of the Mount Albert and Point Chevalier town centres as hubs for the wider suburban area.

- 3 The range of housing typologies, and mix of social, affordable, and market housing that will be delivered through the development that will be enabled by the plan change will contribute to creating a diverse community.

**Outcome 2: neighbourhoods that reflect and value our heritage and unique identity now and into the future**

- 4 The plan change increases the emphasis given to the priorities of the Rōpū, who together represent 13 iwi/hapu of Tāmaki Makaurau, including through amendments to the objectives and policies to provide for contributing to Māori cultural promotion (I334.2(10)(f) and I334.3(4)(e)).

- 5 The plan change also includes a specific policy seeking to encourage the adaptive reuse of the existing buildings with heritage values for retail activities (I334.3(30A)), which is intended to assist in their preservation. The plan change is intended to enable a future community with a higher density urban form but also seeks to minimise the impact of additional development height on the existing neighbouring suburbs by focusing provision



for this height away from these areas. (Refer also the planning report and clause 23 responses on heritage.)

**Outcome 3: high-quality natural environments and sustainable lifestyles**

- 6 The plan change provides for a network of ~9.5 hectares of inter-connected open space and road reserve that will provide scope for extensive native planting, and reinforce existing natural corridors between the precinct, the Wairaka Stream and Te Auaunga/Oakley Creek. The increase in height proposed in the plan change enables additional housing without amending the current standards relating to impervious surfaces. It reinforces the extended walking and cycling networks being built, providing the future community with choices in transport mode and excellent options for accessibility.

**Outcome 4: a strong local economy with thriving town centres**

- 7 The plan change continues the strategy in the operative precinct provisions of supporting the Mount Albert and Point Chevalier town centres, by providing for a supporting level of retail activity within the precinct.
- 8 It will also assist to enhance the local economy by providing additional housing, and therefore population to support the existing town centres, being well-located for accessibility to both Mount Albert and Point Chevalier, as well as generating supporting commercial and retail activity and employment within the precinct.

**Outcome 5: parks and community facilities meet a wide range of needs**

- 9 The Local Board Plan states that the Albert-Eden Local Board “will advocate for adequate open space and community services where there will be large scale developments at the ex-Unitec Institute of Technology site in Mount Albert”. The plan change contains a significant public open space proposal, and discussions with Council and the Albert Eden Local Board on this proposal have been regular and are ongoing.

**Outcome 6: safe, easy and sustainable options for moving around**

- 10 As noted above, the plan change updates the walking and cycling networks within the precinct, including to reflect the more extensive provision proposed. Alongside the open space networks, which will also connect pedestrians within and through the precinct, the plan change supports and enables alternative transport modes.

**'Proposed Plan Change xx (Private) – Te Auaunga'**

*Amending I 334 Wairaka Precinct*

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	P7
<b>Specific request</b>	Please provide an analysis of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
<b>Reasons for request</b>	Required for a full understanding of the proposed plan change in relation to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
<b>Applicant response provided by</b>	John Duthie, Tattico

**Applicant response**

- 1 The information request is for an analysis of the proposed plan change in relation to the National Policy Statement on National Environmental Standards for Assessing and Managing Contaminants in Soils to Protect Human Health 2011 (*NESCS*).
- 2 The purpose of the *NESCS* is to provide a nationally consistent approach to the assessment and management of contaminants in soil for the protection of human health.
- 3 The *NESCS* identifies the matters that will be taken into account when consent is required under the *NESCS*.
- 4 In relation to the precinct, extensive assessment of site investigation and soil sampling has already taken place over the central and northern parts of the precinct, as set out below. The applicant accepts that future consenting will be required in some areas to undertake reporting and testing prior to development of the land where that land is not already the subject of approved consents under the *NESCS*. At this stage, no further assessment under the *NESCS* is required.

*Global land contamination consent*

- 5 The Marutūāhu and Waiohua-Tāmaki Rōpū have obtained a global land contamination consent for the entire HUD properties. This does not include the Whai Rawa, Unitec or Mason Clinic land, but those land owners may have previously undertaken a Preliminary Site Investigation (*PSI*). (It is understood at least Unitec has.) This plan change does not seek any rezoning of those sites (Unitec, Whai Rawa, Mason Clinic).
- 6 The global land contamination consent application was supported by a Detailed Site Investigation (*DSI*) by Beca, including a Contaminated Site Management Plan (*CSMP*) and Remediation Action Plan (*RAP*).

- 7 That consent included a detailed assessment under both the NESCS and the Auckland Unitary Plan (Operative in Part) (*AUP*).
- 8 The DSI identified there were substantial portions of the HUD properties that had no discernible contaminants above trigger levels. There were a number of buildings which had asbestos. There were some locations of potential future contaminants, e.g. coal bunkers on the Taylors Laundry site.
- 9 The existing consent sets out an approved process for the management of land contamination in various parts of the precinct. In certain identified areas it also requires additional investigative work.
- 10 That consent is relied on as part of this plan change request. It provides a comprehensive management regime for all land contamination issues on-site.
- 11 That consent forms part of Council's records, including the consent itself, assessment under the NESCS, CSMP, and RAP.
- 12 To assist reporting officers in their consideration, I reference the consent number, which is BUN 60388418.
- 13 In summary, the Council, in determining the global consent, found that the land contamination matters on the property were appropriately managed through the conditions of consent and the process outlined within the consent such that the effects would all be less than minor.

*Balance of precinct land*

- 14 For the area of the precinct not subject to the global contamination consent, and for which consents are not already held, individual resource consents will be sought at the time of development in accordance with the NESCS and AUP provisions, which are not proposed to be amended through this plan change.
- 15 That approach has been adopted by Ngāti Whātua in seeking consent under the NESCS as a component of its fast-track consent application for development in the south of the precinct. A PSI and DSI were carried out to inform that application, and a CSMP and RAP prepared and provided as part of the application.<sup>1</sup>

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<sup>1</sup> Unitec Residential Development – Wairaka Stage 1, Application materials available here: <https://www.epa.govt.nz/fast-track-consenting/listed-projects/wairaka-stage-1/the-application/>.

**'Proposed Plan Change xx (Private) – Te Auaunga'**

*Amending I 334 Wairaka Precinct*

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

<b>Question</b>	P8
<b>Specific request</b>	Please explain why the applicant has elected not to use the height variation control in the B-MU zone in conjunction with the precinct provisions.
<b>Reasons for request</b>	Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.
<b>Applicant response provided by</b>	John Duthie, Tattico

**Applicant response**

- 1 This question relates to the appropriate method for setting height controls within the precinct.
- 2 The question states that the Council's preference is not to introduce bespoke provisions in precincts when other tools are already available.
- 3 The question is asked as to why the applicant has elected not to use the Height Variation Control in the Business – Mixed Use zone in conjunction with the precinct provisions.
- 4 The applicant considered the available Auckland Unitary Plan (Operative in Part) (AUP) methods for providing for alternate height within the precinct before deciding to propose Precinct plan 3 – Te Auaunga Additional Height and associated precinct provisions. Of relevance:

*AUP tools*

- (a) The Height Variation Control in the AUP is designed to work alongside zonings:<sup>1</sup>

Zones are identified on the planning maps. In addition, zone rules which have a spatial component such as the Height Variation Control are identified on the planning maps.
- (b) The Height Variation Control is therefore used to identify where a variation to the standard zone provisions, i.e. regarding height, applies.
- (c) In contrast, where a precinct is applied, that already acts as an indicator that bespoke provisions apply to that area of land:<sup>2</sup>

<sup>1</sup> AUP, Chapter A Introduction: A1.6.4. Zones.

<sup>2</sup> AUP, Chapter A Introduction: A1.6.5. Precincts.

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Precincts enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling.

- (d) Different methods are used within precincts to set alternative height standards. Some achieve this by reference to sub-precincts,<sup>3</sup> whereas others include a separate precinct plan identifying the different height standards that apply in different areas within the precinct.<sup>4</sup> While there are some limited instances where the Height Variation Control has been applied within a precinct, the applicant understands the above approaches to be the more common method of providing for alternate height within a precinct under the AUP; as additional height provided for within a precinct is necessarily linked to the outcomes sought to be achieved, and activities that are provided for, in that particular precinct; together with the particular assessment criteria contained in the relevant precinct to assist in achieving the stated outcomes.

### *Plan change approach adopted*

- (e) When considering what approach to apply within the existing Wairaka Precinct, it was relevant to consider the existing precinct provisions alongside the outcomes sought to be achieved to provide for the future community within the precinct.
- (f) In the operative Wairaka Precinct, sub-precincts are used for a specific purpose – to identify areas within the precinct where particular objectives apply to enable activities specific to that area within the precinct. Height is addressed separately in the operative precinct provisions.<sup>5</sup>
- (g) It would therefore not be suitable to use the sub-precinct mechanism to set the different height standards sought to be provided for within this plan change.
- (h) Accordingly, the applicant has elected to adopt the approach of providing a separate precinct plan to identify the height sought to be enabled within the precinct in different areas to provide for its future community, recognising that this is a tool that has been used elsewhere within the AUP precinct framework, as set out above.
- (i) Precinct provisions enabling the assessment of development in these areas are proposed with reference to proposed Precinct plan 3.
- (j) That approach is of particular relevance in Height Area 1, where a flexible height arrangement is allowed with three towers enabled up to varying heights. This is not a case of a single set height across this entire part of the precinct. Rather, heights can vary by building in different locations.
- (k) Critical to the workability of the maximum height control in Height Area 1, is the combination of maximum height and maximum diagonal dimension controls. The two standards work together to achieve the desired planning outcome. It is more logical and operationally significantly easier to collocate these provisions within the precinct standards.

### *How Height Variation Control could be used*

- (l) While it could be possible to manage height in other areas of the precinct through the application of the Height Variation Control, that would result in two separate

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<sup>3</sup> For example, the sub-precincts within the Albany 10 and Hobsonville Point Precincts.

<sup>4</sup> For example, Precinct Plan 2 in the Three Kings Precinct.

<sup>5</sup> AUP, I334 Wairaka Precinct: I334.6.4. Height.

frameworks applying within the precinct, which the applicant considers would be an unnecessarily confusing outcome, given that other established tools exist within the AUP. The applicant considers the approach taken in this plan change to be a more straightforward method of identifying the height standards that apply to different areas within the precinct, and the particular provisions that apply to the assessment of building of this height in the different areas.

- (m) The alternative would be applying the Height Variation Control, including with a cross reference to the Wairaka Precinct provisions with respect to Height Area 1, given the particular provisions that apply in this area. However, that would be the first time that approach is used in the AUP. Hence the applicant's preference to manage all height controls through the precinct provisions as proposed in the plan change.

5 In summary, the applicant considers the approach it has taken in this plan change to identifying the various height standards sought to be applied within the precinct to be the most appropriate AUP tool to enable development to provide for the future community within the precinct.

**'Proposed Plan Change xx (Private) – Te Auaunga'**

*Amending I 334 Wairaka Precinct*

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

P8B

**Specific request**

In relation to residential yield it would be helpful to have a comparison with a calculation of what yield is considered reasonably enabled by the current precinct provisions. This will better enable a comparison between current and future assumed needs for, for instance, retail and open space. In that respect it is of concern that the plan change appears to propose maintenance of current levels of retail and open space which may not address the extra demands arising from a significantly higher population. This is not included as an RFI, as it relates to the current rather than proposed provisions. However the applicant is encouraged to provide this information.

**Applicant response provided by**

John Duthie, Tattico

**Applicant response**

- 1 This is a non-clause 23 response.
- 2 The Council has requested a comparison of yield between the existing operative Wairaka Precinct and new requested precinct provisions. The request particularly asks for an assessment of whether the proposed open space area and retail provision are adequate in light of the proposed increase in density that will be enabled by the plan change.
- 3 The author was directly involved in the development of the Wairaka Precinct and advancing those provisions through the Auckland Unitary Plan (Operative in Part) (AUP) process, working initially for Unitec and subsequently for the Wairaka Land Company. This included securing all resource consents for the core campus development, developing the draft Wairaka Precinct provisions and appearances through the Proposed AUP submission process.
- 4 The information set out in this response relating to the historical development of the precinct is drawn only from reports, evidence and summary material tabled through the Proposed AUP hearing process or related publicly available information.

**Original yield: Wairaka Precinct**

- 5 The original Wairaka Precinct comprised the following components:
  - (a) The Mason Clinic and Taylors Laundry site were included within sub-precincts with yield treated on a "status quo" basis.

- (b) The provisions applicable to the core Unitec campus provided for the expansion of the educational facilities with no residential development enabled on the land zoned Special Purpose - Tertiary Education zone under the former Wairaka Precinct. Unitec did envisage extensive student accommodation on the western part of the campus on the land now proposed to be rezoned from Special Purpose - Tertiary Education to Business - Mixed Use (*BMU*) as part of its plan change request.
- (c) The provisions applicable to the Ngāti Whatua Whai Rawa Limited land were intended to enable redevelopment comprising terrace house and apartment buildings, but to be led by Whai Rawa independent of the Wairaka Land Company initiatives. (Note, there is no change to the intention that Ngāti Whatua Whai Rawa Limited will make the decisions for their land, independent of this plan change.)
- (d) Provisions applicable to the Former Oakley Hospital Building were intended to enable a mix of community facilities, professional offices and residential apartments. This mix was envisaged as part of the adaptive reuse and conservation of this building. The significant majority of the floor space was intended to be residential, but obviously limited to the two / three levels of the existing building.
- (e) The provisions applicable to the northern and central lands were intended to enable redevelopment for residential activities (and a retail node on the Carrington Road frontage adjacent to Gate 3).
- (f) Rezoning of the land along the southern boundary between the tertiary institution and the neighbourhood to the south were intended to enable terrace house development.
- (g) The 'B blocks' adjacent to the Carrington Road frontage between Gate 3 and Woodward (part of the land requested to be rezoned *BMU* under this plan change) were intended to be used for business development in support of the Unitec programme. Unitec, as an applied learning institution, sought to co-locate critical businesses that could provide work experience, and accordingly leverage off their location adjacent to a technical tertiary institution for academic purposes.
- (h) The 'F block' land adjacent to the Spine Road (the other part of the former Unitec land subject to this plan change request) was intended as a location for student accommodation associated with Unitec. Unitec was targeting between 1,000 and 1,500 student apartments: with a combination of local students and international students, which was a growing opportunity at that time.
- (i) Consequently, the yield in the Wairaka Plan Change as placed before the Hearings Panel comprised:
  - (i) an expectation of ~ 2,500 dwellings on the Wairaka Land Company area;
  - (ii) an expectation of ~ 1,000-1,500 student accommodation on the F blocks;
  - (iii) Whai Rawa developing as per their current entitlement; and
  - (iv) the Mason Clinic being a specialist self-contained area.
- (j) This gave a yield of between 3,500 and 4,000 dwellings if fully developed, plus the Whai Rawa land.



### Yield comparison

- 6 As noted above, the original proposal gave a yield of between 3,500 and 4,000 if fully developed. This proposal, over the same land area for the purposes of direct comparison, is for 4,000-4,500 dwellings. This represents an increase of up to 500 dwellings in a comparison between the high scenario of Wairaka Land Company versus the high scenario now (with the same difference in the low versus low scenarios), or an increase of 1,000 dwellings if one compares the low range under the Wairaka Precinct with the high range under the Te Auaunga Precinct.

### Context

- 7 Under this plan change request:
- (a) The Crown has purchased the B and F blocks off Unitec to repurpose them for residential housing. These are shown on the attached plan to assist in understanding the location of this land.
  - (b) The B blocks will retain a mixed use function but the reality is that a higher percentage of residential uses will occur, when contrasted against the full business future envisaged under the original Wairaka Precinct.
  - (c) The Taylor's Laundry site has been purchased by the Crown. This will remain in its current industrial uses until the lease is relinquished or expires in the medium term, but at that time it will transition to residential.
  - (d) The F blocks will retain their residential function. The assumption is that a stormwater pond originally envisaged in this location is no longer required (due to changes in the Council's approach to stormwater management). Instead of being a very high percentage of one bedroom apartments with a small number of family accommodation targeted at PHD students; the F blocks have been modelled for a range of different housing typologies including one, two and three bedroom apartments.
  - (e) The increase in height has obviously provided for additional yield.
- 8 In addition it should be noted the Crown transferred approximately 3ha of land to Te Whatu Ora – Waitematā (previously the Waitematā District Health Board), for additional mental health service facilities at the Mason Clinic. That land would otherwise be available for housing and related private open space. Effectively the 1.7ha block in the north was land previously available for residential development. The 1.3ha in the south was originally intended to be private open space, as shown on Wairaka Precinct plan 1. HUD has agreed to exchange this private open space land for indicative public open space within the Crown land holdings. The net effect is that 3ha of land which was previously available for housing is now committed to mental health services and/or indicative public open space. The 3ha lost to residential is the 1.7ha of land in the northern part of the Mason Clinic and need to substitute 1.3 ha of otherwise residential land to offset the private open space lost from the Mason Clinic site
- 9 The Mason Clinic planning controls are subject to Plan Change 75.

### Land area comparison

- 10 In respect of the current and plan change land areas proposed:

- (a) The operative Wairaka Precinct provides:
- (i) 19.9ha of residential land able to be built for apartment typologies to 27m as a permitted height;
  - (ii) 0.9ha of land in the north-western corner;
  - (iii) 1.1ha at an 18m height (excluding the 8m road widening on Carrington Road from this calculation under both scenarios);
  - (iv) 4.4ha of Residential – Terrace Housing and Apartment Building (THAB) land on the Whai Rawa site; and
  - (v) 5.1ha of terrace house product in the Residential – Mixed Housing Urban zone along the southern boundary.
- (b) By contrast, the proposed Te Auaunga Precinct provides for:
- (i) 15.4ha of residential land able to be built for apartment typologies to 27m as a permitted height;
  - (ii) 5.6ha of land zoned with a 35m permitted height;
  - (iii) 0.9ha of land intended to accommodate three high rise apartment buildings.
  - (iv) 4.4ha of THAB land on the Whai Rawa site;
  - (v) 5.1ha of terrace house product along the southern boundary.

11 The table below sets out a direct comparison:

	<b>Wairaka Precinct</b>	<b>Te Auaunga Precinct</b>
18m Height Limit	1.1 ha	-
Height Area 4	19.9 ha	15.37 ha
Height Area 2	-	4.36 ha
Height Area 1	-	0.88 ha
Height Area 3	-	2.0 ha
Former Oakley Hospital Building	1.8 ha	1.83 ha
Residential – Terrace Housing and Apartment Building zone	1.4 ha	1.42 ha
Residential – Mixed Housing Urban zone	3.6 ha	3.67 ha

Whai Rawa	4.4 ha	4.36 ha
<b>Total</b>	32.2	33.8

12 With respect to the land area comparison above, the following points are of particular relevance:

- (a) The Taylors Laundry site lease (which provides for an industrial activity on that site) is due to expire in the medium term. HUD has purchased the land. Post this lease being relinquished or expiring, it is assumed that it will be developed for housing. This analysis assumes that the owner of that property would also have developed it for its best commercial return at that stage, which would be housing.
- (b) The 35m height limit is an area of approximately 6.6ha allowing a theoretical additional two storeys of development within this area. The yield analysis under clause 23 response P1 shows how only part of this land will be available for actual housing and not all will likely be an apartment typology. Even if it were all developed as an apartment typology, this would add an extra approximately 62 dwellings above existing heights (applying the assumptions in clause 23 response P1).
- (c) The diagonal dimension controls and restrictions on the high rise give a comparator in this location under the current precinct of 280 dwellings versus the new precinct of 307 dwellings. (Based on the yield assumptions and calculations, refer clause 23 response P1.)
- (d) The most significant land area change is the inclusion of the B blocks for housing, although this is partially offset by the loss of 3ha of land to the Mason Clinic.

**Open space**

13 This element of the request seeks comment on whether the yield enabled by the plan change will result in an appropriate provision of open space.

14 The open space responses are fully addressed at clause 23 responses OS1-OS8. That is not repeated here. In summary:

- (a) The operative Wairaka Precinct provisions provide for 2,500 dwellings within the Wairaka Land Company area based on the provision of a 3,000-5,000m<sup>2</sup> (or 0.3 – 0.5ha) public neighbourhood park (but recognising Phyllis Reserve was immediately on the southern boundary and provided good functionality to that part of the precinct).
- (b) The plan change provides for 5.1ha (or 51,000m<sup>2</sup>) of open space all of which is proposed to vest in the Council as either public open space or stormwater management area. The specific areas and function of open space is addressed in clause 23 response OS8. The stormwater management areas are the artificial ponds within the precinct. These are not counted as public open space but contribute to the landscape amenity of the area (recognising Phyllis Reserve remains on the southern boundary and continues to provide good functionality to that part of the precinct)
- (c) The open space areas are distributed between the north, central and southern part of the precinct. When the Phyllis Reserve is taken into account, all dwellings are within 400m of a public park (subject to the outcome of negotiations with Council).

(d) The open space provides a wide variety of functionality as set out in the response to clause 23 request OS3 and OS4.

15 Whether the yield uplift is considered at 500 or 1,000, the increase in public open space as part of this plan change is considerable.

### **Retail**

16 The question has been raised as to whether there is sufficient retail in the precinct. Mr Heath has addressed this issue from an economic perspective at clause 23 response EA1.

17 This plan change does not seek to amend the overall cap on retail floor space. This follows the Council's key focus at the Proposed AUP hearings that it wanted to support the Point Chevalier and Mount Albert town centres by limiting the gross floor area of permitted retail development within the precinct to 6,500m<sup>2</sup>. Furthermore, retail was distributed between:

(a) that associated with the campus;

(b) a core retail node around Gate 3; and

(c) the provision for retail within the Former Oakley Hospital Building to assist in the adaptive reuse of this building and to assist with the connection to Point Chevalier.

18 From a planning perspective, I make the following observations:

(a) The northern portion of the precinct is within the walkable catchment of the Point Chevalier town centre. For the first time, Point Chevalier town centre will have a residential population in its southwestern quadrant. This will increase its catchment. A walkable catchment to a town centre helps reinforce the economic sustainability of the centre.

(b) The new retail hub adjacent to Gate 3 provides a good service area to the central part of the precinct and to the properties on the eastern side of Carrington Road. It creates retail services within a good walkable catchment of this part of the precinct. It is also the prime access to the central part of the precinct for vehicles. It sits on the major public transport corridor of Carrington Road. There will also be a dedicated cycleway that connects through the precinct to this retail area.

(c) While further away, the southern end of the precinct is within a reasonable walking distance of the Mount Albert shopping centre.

(d) The BMU zone does provide for small dairy and food and beverage type operations within the zoning. Immediate top-up shopping provision can be made elsewhere in the precinct if there is a demand.

**'Proposed Plan Change xx (Private) – Te Auaunga'**

*Amending I 334 Wairaka Precinct*

**Applicant:** Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

**Address:** 1-139 Carrington Road, Mt Albert

**Proposed activities:** PPC – Partial Rezoning and Revised (currently Wairaka) Precinct Provisions

**Question**

P9 & P10

**Specific request P9**

Spatial Distribution of future land use activities. It will be noted that a number of the Council's specialists (including under UD9 and EA1) have raised concern that the plan change, while identifying the location of some activities (e.g. open space on the precinct plan and retail in the provisions) and limitations on where industrial activities may be located) does not provide clarity on whether the location of non-residential activities in particular may be located in respect of the needs of the future community, and effects on the residential community. It is also difficult to appreciate how various land use activities may be connected to each other and to places beyond the precinct. Further, the retail activity locations are similar to those in the current precinct and may not be best located for the nodes of new development enabled by the proposed provisions. The Applicant is invited to reconsider whether what is proposed provides sufficient clarity in relation to these concerns. In that respect, while a master plan may not be a requirement of the plan change itself, it can nevertheless illustrate the vision sought for the site. There has clearly been much consideration of this already, and perhaps further planning that is underway. The Applicant is invited to share as much of that planning as possible, as it may alleviate some of the concerns that are and could still be expressed about how the Precinct could develop, particularly in a way that does not address context and the needs of the community as a whole.

**Specific request P10**

The approach that has been taken in the plan change is to amend the current precinct provisions, rather than take a fresh look at how it is intended this future community will look (the vision) and what better way there may be to plan, through the AUP, for that future community. As an example, Objective 1 still refers to provision of a tertiary institution. While that will still be a major presence in the future community, what is intended to be enabled is more a higher density residential community – of 10,000 or more residents. Whether that ultimate urban outcome is adequately portrayed in the objectives and policy framework proposed is questionable. The Applicant is invited to reconsider whether the proposed provisions provide sufficient clarity in relation to these concerns.

**Applicant response provided by**

John Duthie, Tattico

### Applicant response

- 1 These are non-clause 23 matters.

#### Modification to an existing precinct

- 2 As noted in the comments, this plan change is a modification to an existing precinct. It is not a new precinct.
- 3 The existing precinct has been through an extensive process of assessment and scrutiny as part of the introduction of the Auckland Unitary Plan (Operative in Part) (*AUP*) provisions.
- 4 Generally, the precinct provisions are working well and the applicant considers, with some amendments, they will deliver the outcomes all parties seek for the precinct. There are however some identified provisions where changes are warranted in order to deliver the overall strategy and direction for the precinct. This plan change provides for those key elements as set out in paragraph 1.12 of the Planning Report including section 32 assessment dated 21 December 2022.
- 5 The AUP Independent Hearings Panel recommended, and the Council adopted, the operative Wairaka Precinct provisions. It is not necessary or appropriate to revisit all aspects of the original precinct through this plan change. Rather, the section 32 analysis and these clause 23 responses focus on the impact of the changes proposed and how these meet the tests of section 32.
- 6 Clause 23 request P10 raises the example of objective 1 referring to Unitec and the view that the precinct is now largely residential. While there are changes to the respective proportions of land allocated to tertiary and residential uses, Unitec remains a major part of the precinct and an important tertiary educational institution for Auckland, and needs and warrants particular precinct provisions. The HUD and consultant team view is that the precinct provisions not proposed to be modified by this plan change remain appropriate and fit for purpose.

#### Spatial distribution

- 7 The clause 23 request raises issues of spatial distribution on the precinct. In that regard:
  - (a) The tertiary institution at the Unitec core campus is retained, remains on its existing site and will be progressively developed in accordance with the long-term plan for that institute (now part of Te Pūkena). The only effect of this plan change is to change the zoning of land purchased by the Crown from Unitec.
  - (b) The Mason Clinic remains on its existing site but is expanded. That is subject to a separate Plan Change 75 process.
  - (c) The retail hub remains in its current location. That location was identified and supported by assessments during the AUP process. That process:
    - (i) identified the gross floor area cap for retail;
    - (ii) allocated a core retail area as part of the campus (food and beverage, bookshop opportunities etc);
    - (iii) allocated the core location for the hub to service the precinct and local community;

- (iv) identified the importance of locating this retail hub between the Mount Albert town centre and Point Chevalier town centre so as to reduce the impact on those two centres and maximise convenience for the precinct (as it is approximately at the precinct's midpoint);
  - (v) identified the importance of locating the retail hub on the public transport route giving it the ability to service both the new Te Auaunga neighbourhoods, the tertiary staff and students, and the neighbourhoods east of Carrington Road; and
  - (vi) located the retail hub adjacent to the Farm Road intersection, at the top of the future public shared exit / entrance for both the residential neighbourhood and Unitec, because this provides good connections to both the Unitec campus and the residential neighbourhood.
- (d) Notwithstanding the changes proposed to distribution of land uses through the plan change and increase in overall dwelling scale that will be enabled, Mr Tim Heath has confirmed his response to the economic clause 23 requests that the above factors continue to apply to, and support, the proposed retail distribution within the precinct.
- (e) Unitec is an applied learnings tertiary institution. A significant component of the facility is practical training. During the AUP process Unitec sought a range of semi-industry or service type activities within its zone to assist in that learning process. Major IT service centres, veterinary clinics, electronics and construction activities are examples of what has been used currently or in the past to complement the Unitec courses.
- This plan change preserves that opportunity. However, while that opportunity currently exists through the majority of the precinct (excluding the southern interface), this plan change ensures these uses are located away from the Carrington Road frontage. The combination of the new control, and the existing control, ensures that these types of activities are removed from existing established residential areas. New residents moving into the precinct understand that they are living within a mixed-use area.
- (f) Community facilities are enabled within the residential neighbourhoods. The level of community facilities is expected to be relatively modest but it is not practical to predetermine the extent or location. The intention is to embed these within the precinct. The Pumphouse is an example of what could either be a retail food and beverage facility or a community facility, or both.
- (g) The vast majority of the HUD land is intended for residential development. To the extent practical, the spatial distribution on the precinct is known and established. The precinct plan, through the sub-precincts, identifies the location of:
- (i) the Unitec campus;
  - (ii) the Mason Clinic;
  - (iii) Taylors Laundry and the industrial activity associated with that leasehold land, while this activity remains;
  - (iv) the low rise development along the southern boundary;

- (v) the heritage precinct in the north (identified through the overlays within the AUP);
  - (vi) the area of protected trees;
  - (vii) the open space; and
  - (viii) the areas of increased height.
- (h) In a land use spatial distribution sense these key elements are defined to the extent appropriate through Precinct plan 1.

**Masterplan**

- 8 This question again raises the issue of the masterplan. That is addressed in clause 23 response UD9. In summary:
- (a) The two previous masterplans for the precinct have been major informers of the Precinct plans and the form of development enabled within the precinct. The Reference Masterplan and Strategic Framework in particular is expected to continue to inform the development as it progresses.
  - (b) However, it is the precinct provisions which set the regulatory controls and mechanisms.
  - (c) Every new development is a restricted discretionary activity and is subject to an extensive assessment.
  - (d) The tests of section 32 and the level of analysis required under that legislation, should not be conflated with the assessment for a resource consent.
  - (e) The current masterplans for the precinct have performed the required functions necessary to inform this plan change.