



## Section 32 Assessment Report

Silverdale West Precinct

Private Plan Change Request

RMA Schedule 1 Clause 24 Update - 17 May 2024

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## 2.0 THE APPLICANT AND PROPERTY DETAILS

<b>To:</b>	Auckland Council
<b>Site Address:</b>	<b>1636-1738 Dairy Flat Highway and 193 Wilks Road, Silverdale, Auckland 0792</b>
<b>Applicant Name:</b>	Fletcher Development Limited and Fulton Hogan Land Development
<b>Address for Service:</b>	Unio Environmental Ltd Private Bag 92518 Auckland 1141 Attention: Ross Cooper / Karl Cook
<b>Legal Description:</b>	Refer to list of properties in <b>Appendix 2</b>
<b>Plan Change Area:</b>	107.35 hectares
<b>AUP Zoning:</b>	Future Urban Zone
<b>AUP Precinct:</b>	N/A
<b>Locality Diagram:</b>	Refer to <b>Figure 2</b>
<b>Brief Description of Proposal:</b>	Private Plan Change request to rezone approximately 107.35 hectares of land in Silverdale West from Future Urban Zone to Business - Light Industry zone.

### 3.0 EXECUTIVE SUMMARY

This report has been prepared to detail the request made by Fletcher Development Limited and Fulton Hogan Land Development for a Private Plan Change to the provisions of the Auckland Unitary Plan (Operative in Part) (**AUP**) to rezone 107.35-hectares of land in Silverdale West for urban activities. The Silverdale West Private Plan Change (**PPC**) request is made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991 and has been informed by the Silverdale West Dairy Flat Industrial Structure Plan (**Structure Plan**) adopted by Auckland Council in April 2020.

It is proposed to rezone land within the Future Urban Zone to Business – Light Industry Zone and to establish the Silverdale West Precinct over the land in order to align future subdivision and development with the provision of the necessary transport and service infrastructure, as well as landscape, stormwater management and ecological outcomes.

The Auckland Future Development Strategy sets out the indicative timeframe for Silverdale West Stage 1 being ‘development ready’ as being 2030+. In this case the detailed technical analysis to inform this Plan Change has identified the necessary infrastructure requirements to support development within the Plan Change area. Of particular importance is that suite of transport upgrades needed both within Silverdale West and the wider transport network to facilitate the staged development of Silverdale West are specifically identified within the PPC. If development occurs prior to the Council providing the necessary infrastructure upgrades, the Applicants have confirmed that they are capable and willing to cover those costs up front and will seek to enter into agreement(s) with Council to ensure implementation of all necessary infrastructure and that appropriate credits for those works are recognised. The PPC includes all necessary infrastructure upgrades as prerequisites to development within the Plan Change area, ensuring that no burden associated with bringing the implementation of Silverdale West Stage 1 forward falls on the Council.

Bringing forward the release of land will contribute to a well-functioning urban environment through providing industrial land to satisfy demand for industrial land over the short-medium within the north and in turn reducing the need for some people to travel outside the wider Silverdale / Dairy Flat / Hibiscus Coast areas, area for work. In this regard, the earlier sequencing gives effect to Policy 8 of the NPSUD.

Based on an assessment of environmental effects as set out in section 10 of this report and the specialist technical assessments that have informed the PPC, it is concluded that the PPC will have positive effects on the environment in terms of the social and economic well-being of the community as well as the enhancement and protection of waterways. Where adverse effects are anticipated, the proposed policies and rules of the PPC, in addition to those in the Auckland-wide and zone provisions, will ensure they are appropriately avoided, remedied or mitigated.

An assessment against the provisions of section 32 of the RMA is provided at section 11.0 of this report. This includes an analysis with respect to the extent to which the objectives of the PPC are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the PPC are the most appropriate way to achieve the objectives. That analysis concludes that:

- The proposed objectives in the Silverdale West Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable appropriate urbanisation of the site
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.

For the above reasons, it is considered that the proposed Plan Change accords with the sustainable management principles outlined in Part 2 of the RMA and should be accepted and approved.

## 4.0 INTRODUCTION

This report has been prepared as part of the Silverdale West Proposed Private Plan Change (PPC) which is requested under Clause 21 of Schedule 1 of the Resource Management Act 1991 (RMA), submitted by Fletcher Development Limited and Fulton Hogan Land Development (the applicants). The PPC is in accordance with Clause 21 as the applicants seek a change to the district plan provisions of the Auckland Unitary Plan (AUP). The applicants collectively own (or are prospective purchasers) of the majority of the land within the Plan Change area, as shown in

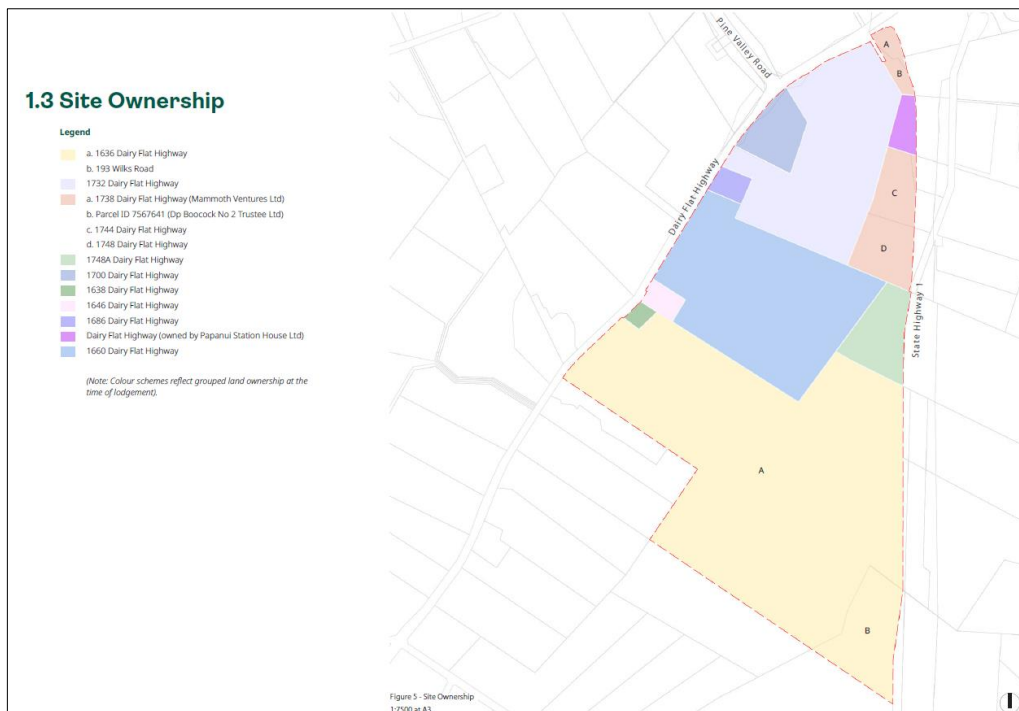


Figure 1 below.

The applicants have an established track record in commercial and residential development and are seeking to rezone approximately 107.35ha of land in Silverdale West from Future Urban to Business – Light industry. The applicants envisage that the PPC will provide for additional light industry development and employment opportunities on the edge of Silverdale, away from more sensitive residential uses and directly adjacent to State Highway 1 (SH1).

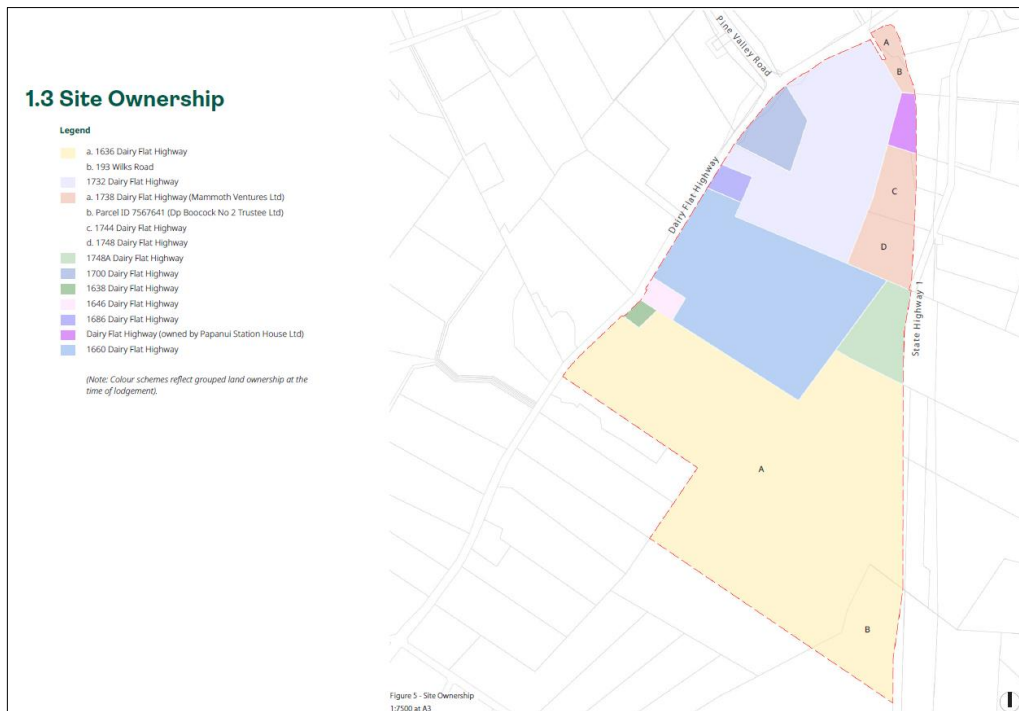


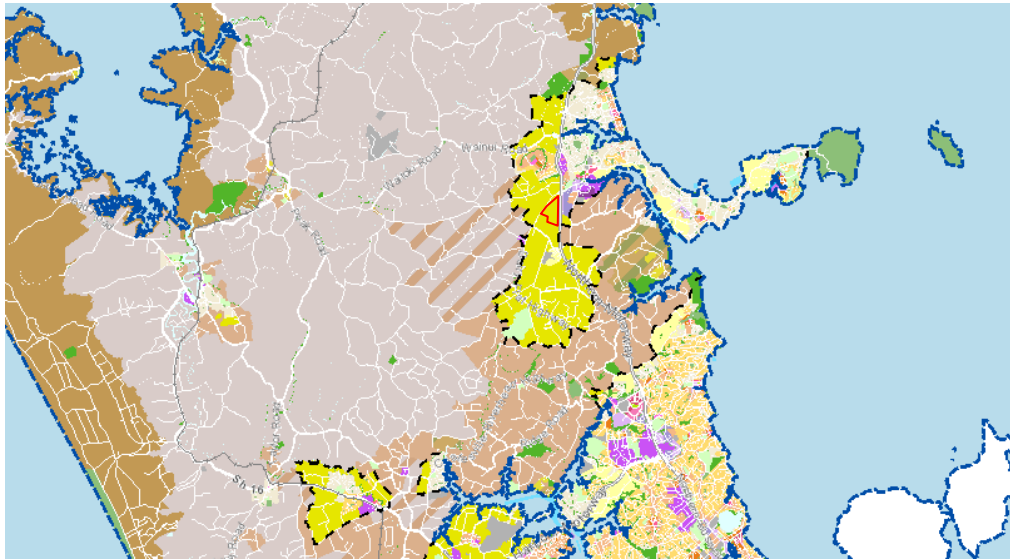
Figure 1: Fletcher Development Limited and Fulton Hogan Land Development landholdings within Silverdale West Plan Change area.

## 5.0 SITE LOCATION AND DESCRIPTION

### 5.1 SITE DESCRIPTION

The PPC area encompasses approximately 107.35 hectares of Future Urban zoned just southwest of Silverdale town centre (**Silverdale West**). Silverdale West is located in the North of Auckland some 30km (30min drive) from Auckland’s City Centre. **Figure** shows Silverdale West in a wider regional context.





**Figure 2: Silverdale West's location within the wider Auckland region.**

The Plan Change area is a physically well-defined area located between SH1 to the east and Dairy Flat Highway to the west. Agricultural land currently borders the south of the site, although that land also has a Future Urban zoning. The Plan Change area is generally triangular in shape, with individual land parcels creating a geometric pattern of shelterbelts and other farm boundary definitions. A locality plan of the Plan Change area is included as **Figure 3** below.

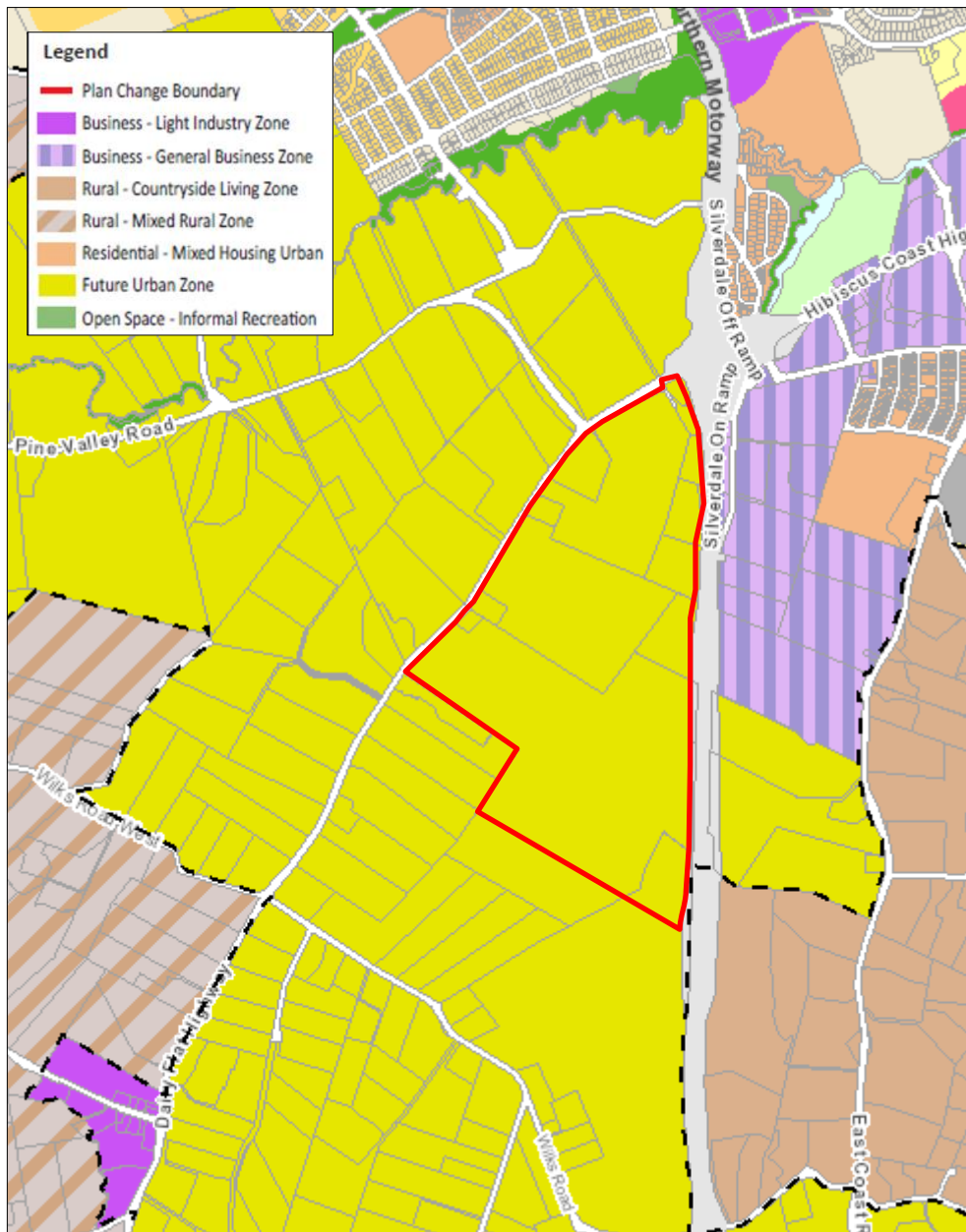


Figure 3: Zoning map of the Plan Change area.

The current land use within the Plan Change area is predominantly farming activity. Various residential and farm buildings are present across the Plan Change area. Smaller landholdings (especially along Dairy Flat Highway) have been more intensively managed as residential and lifestyle blocks.

The landform is a gently sloping valley with the main watercourse, John Creek, a permanent stream that flows south-north through the site. Agricultural and past farming activities have removed almost all indigenous vegetation, although there are two defined clusters towards the northern extent of the Plan Change area. Vegetation communities are almost entirely dominated by pastoral grassland, with patches of low scrub

(comprising mostly exotic weedy gorse, woolly nightshade and Chinese privet) within the lower gully system, mature pine trees, and exotic tree shelterbelts. The few native trees or shrubs that exist have either been self-sown by birds or wind or have been planted as part of amenity plantings associated with dwellings. There is one significant natural area mapped within the Plan Change area.

The network of watercourses within Silverdale West consists of small headwater streams and four permanent watercourses (as detailed within the Ecology Assessment prepared by RMA Ecology included at **Appendix 8** to this report), including:

- John Creek which flows south-north through the centre of the site
- Streams P1 and P2 on the eastern side of the site, and
- Stream P3 which flows from the southern boundary and joins John Creek at the southern end of the site

The most substantial watercourse at the site is John Creek. The stream is not fenced and is highly degraded. Likewise, the smaller intermittent streams and ephemeral tributaries are in pasture areas, and consequently are highly degraded due to a lack of riparian cover and severe stock damage to stream beds.

Fifteen wetlands that meet the definition of ‘natural inland wetland’ in the National Policy Statement for Freshwater Management 2020 (**NPSFW**) were identified on the site. Wetlands are mostly within the flood plain of John Creek or have been induced in small catchments due to agricultural land practices. All wetlands have been highly degraded through historic agricultural activities, resulting in significant modification to the soils and plant communities. The wetlands are of low ecological value, and typically consist of common native and exotic rushes and herbs adapted to wet soils and are unlikely to offer core, important or significant habitat for indigenous fauna.

There are a number of overland flow paths that traverse the Plan Change area.

SH1 adjoins the eastern boundary of the Plan Change area and can be accessed via the Silverdale interchange. SH1 provides connections to Auckland, Silverdale, Warkworth, Wellsford and the Northland region. Dairy Flat Highway runs along the western boundary of the site and connects to SH1 and Hibiscus Coast Highway in the north via the Silverdale Interchange.

The public transport services Hibiscus Coast Station and Park and Ride is located 450m from the northern extent of the site. This provides access to a number of bus routes to locations including Britomart, Waiwera, Gulf Harbour, Albany, Orewa and Millwater. The 986 bus-route connects the Hibiscus Coast Bus Station with the Albany Bus Station via Dairy Flat Highway.

A bus route operation connecting the rapidly growing Milldale Precinct with the Hibiscus Coast Bus Station via Argent Lane commenced in November 2022. This route could be extended to cover the Silverdale West area, providing connectivity between the residential catchment of Milldale with the employment area within the Silverdale West

PPC area, whilst also connecting both areas with the Hibiscus Coast Bus Station for onward connections to other parts of the Auckland metropolitan area.

## 5.2 SURROUNDING AREA AND LOCAL CONTEXT

In the wider context, the Plan Change area forms part of the extensive growth area in Auckland's North. In particular, the wider Wainui, Silverdale and Dairy Flat Future Urban zoned area is approximately 3,500ha extending from Upper Orewa in the north to Dairy Flat in the south.

In terms of land use and built form in the immediate locality, the Plan Change area is located directly southwest of the Silverdale town centre. There is an existing employment area (industry and general business zoning) and SH1 separating the Plan Change area from the town centre. The Milldale development, a new urban community, is located 1400m to the north of the Plan Change area. To the west and south of the Plan Change area is future urban zoned land.

The land to the south is identified within Stage 2 and 3 of the Silverdale West Structure Plan. The land to the west is yet to go through a structure planning process however, the Council's draft spatial strategy for the north has indicated that this will be high density residential area with a supporting town centre.

The Plan Change area is located close to a number of residential catchments, although it is noted that it does not immediately adjoin any of these, all of which are located outside the block of land bounded by arterial roads / SH1 that contain the Plan Change area. The nearby residential catchments include:

- Silverdale residential areas located to the east of state highway way, in and around the Hibiscus Coast Station Park and Ride, including areas to the north and south of Twin Coast Discovery Highway
- Milldale (located approximately 1.4km to the north of the Plan Change area)  
Milldale is primarily zoned for residential use (Terrace Housing and Apartment Building, Mixed Housing Urban and Mixed Housing Suburban zones), and also includes a centrally positioned local centre and zoning for four neighbourhood centres to service the residential development. The Milldale development will comprise 4,500 houses at a mixture of densities, 40,000sqm of commercial development, a primary school and an extensive network of open spaces. Argent Lane is the key north-south arterial through Milldale which is currently being built. This road is currently being constructed as a two-lane road with provision to expand to four lanes when required. Construction of Milldale is underway and is projected to be complete by 2030.
- Milldale North  
A structure Planning exercise is currently being undertaken for the FUZ land to the north of Milldale. The Structure Plan is intended to become an extension to

the Milldale development offering residential development (2,500 dwellings), open spaces and an education campus (three schools proposed at this site).

The Plan Change area is also accessible to a range of social infrastructure including healthcare facilities within Silverdale Town Centre. Ahutoetoe School is within a 2-3 km distance of the Plan Change area, as well as a series of community facilities including Early Learning Centres, open spaces and amenities.

## 6.0 PLAN CHANGE REQUEST

The intention of the PPC is to rely largely on standard zones and Auckland-wide provisions to manage the way in which the Plan Change area is used and developed.

Consistent with other greenfield precincts within the AUP, the proposed precinct also includes place-based provisions that create a spatial framework for development. The precinct provisions are appropriately focused on the layout of development necessary to achieve the objectives of the AUP, including:

- Recognising Mana Whenua values;
- Achieving an appropriate urban layout;
- Providing an integrated and connected street network;
- Enhancing the riparian margins of streams;
- Ensuring development coordinates with the required infrastructure upgrades; and
- Incorporate appropriate flood management measures.

On balance, this approach enables the Plan Change area to develop to a scale and intensity which is broadly consistent with areas of similar zoning patterns across the region. The precinct will, however, include some variation to the standard Auckland-wide and zone provisions to introduce more tailored standards, matters of discretion and assessment criteria. This will support the development of a quality built environment within this locality that responds to landform and natural characteristics of the Plan Change area.

### 6.1.1 Overview of the Proposed Zoning

This PPC seeks to rezone approximately 107.35-hectares of Future Urban zoned land for urban development, which will comprise approximately 107.35 ha being zoned Business – Light Industry Zone.

The proposed zoning pattern is shown in **Figure 4** below. The intention of the proposed zoning is to provide for the establishment of a new industrial area in Silverdale West strategically located away from sensitive residential developments and directly adjacent to SH1 providing direct access to Auckland city centre and the northern regions. The imminent exhaustion of light industry zoned land supply in the North Shore, Silverdale and the Highgate Business Park is well-articulated in the Silverdale West Structure Plan (**the Structure Plan**), the Future Urban Land Supply Strategy 2017 (**FULSS**) and other Council-initiated documents since 2010. The proposed Light Industry Zoning is consistent with the Structure Plan.

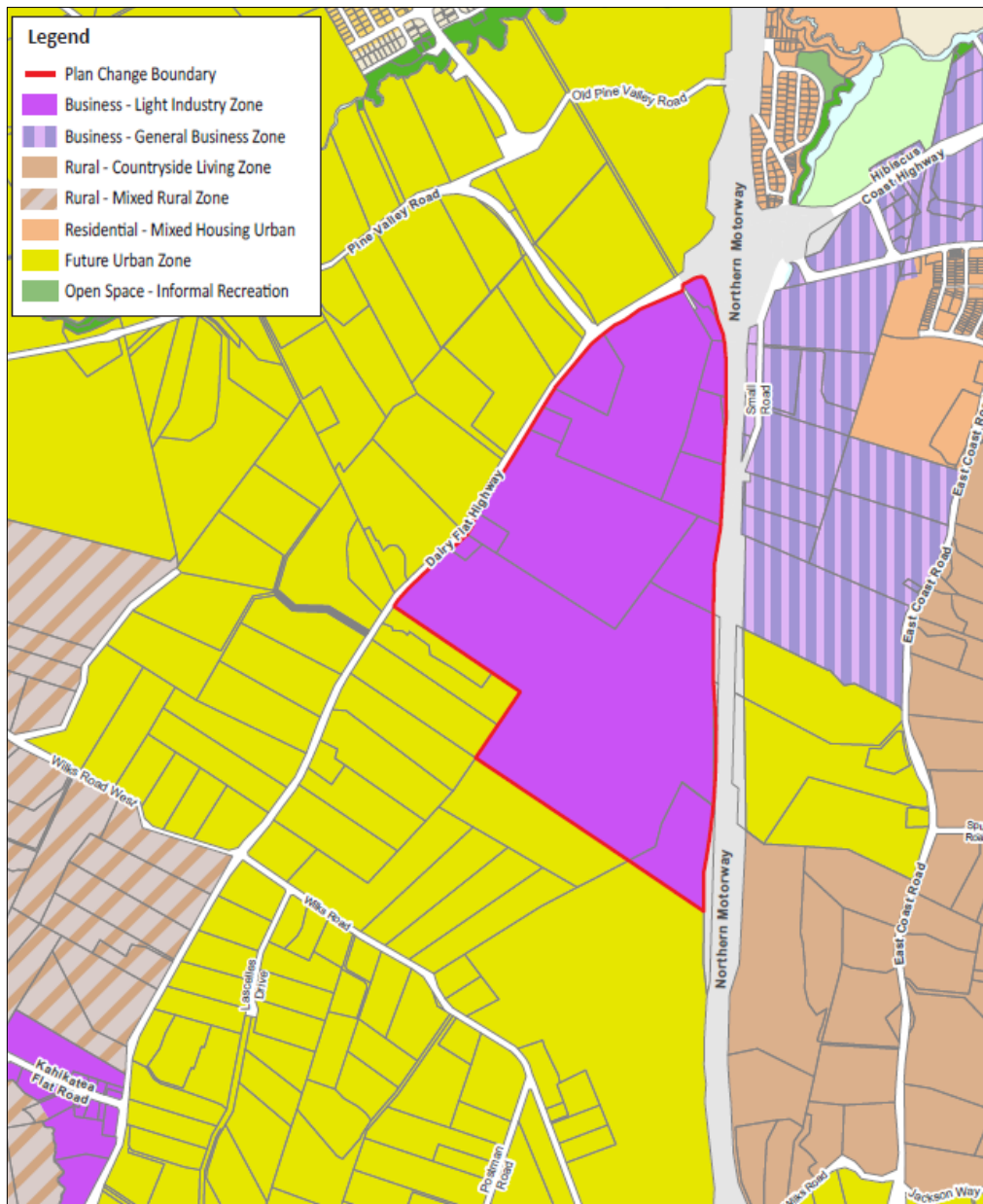


Figure 4: Proposed zoning.

### 6.1.2 Other Auckland Unitary Plan Controls

In relation to stormwater, it is proposed to apply the Stormwater Management Area Control – Flow 1 ('SMAF 1') across the majority of the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments.



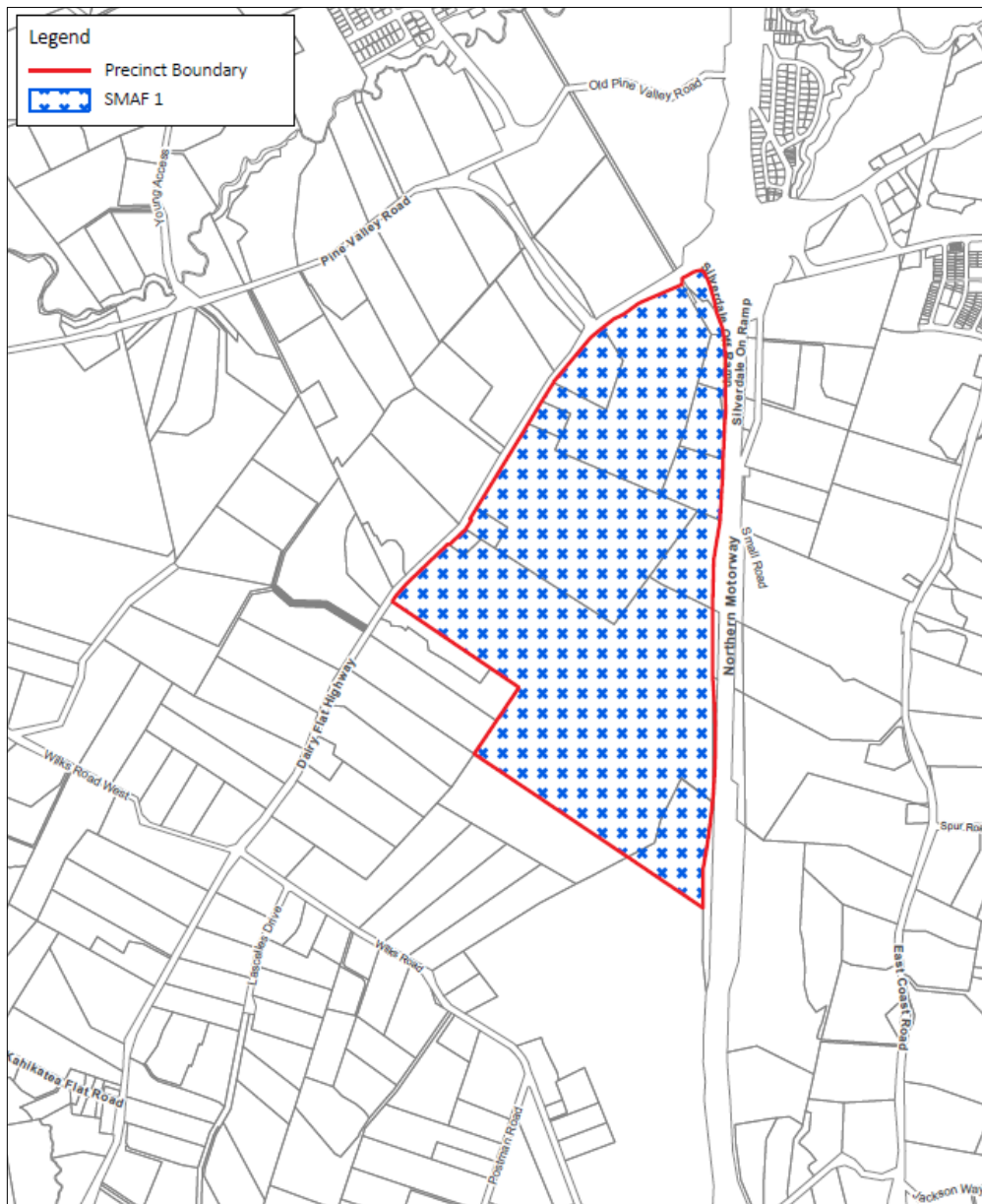


Figure 5: Proposed SMAF 1 control.

Additionally, Auckland Council’s Region-wide Stormwater Network Discharge Consent (**Stormwater NDC**) includes requirements to prepare a Stormwater Management Plan (‘**SMP**’) and meet defined outcomes. This requirement will be triggered as part of future consent processes, however provisional approval is sought for the SMP as part of this PPC process as evidence that stormwater is able to be managed in line with the requirements of the Stormwater NDC.

The Macroinvertebrate Community Index – Rural notation is proposed to be deleted from the planning maps across the proposed Silverdale West Precinct and replaced with the Macroinvertebrate Community Index – Urban notation. Additions are proposed to the Notable Trees and Significant Ecological Areas Overlays and related schedules in the AUP.



### 6.1.3 Proposed Precinct Provisions

The ‘Silverdale West Precinct’ is proposed to apply to the Plan Change area to manage the effects of urbanisation on the local environment and to ensure that development responds to the characteristics of the site refer to the Silverdale West Precinct Plan at Figure 6:

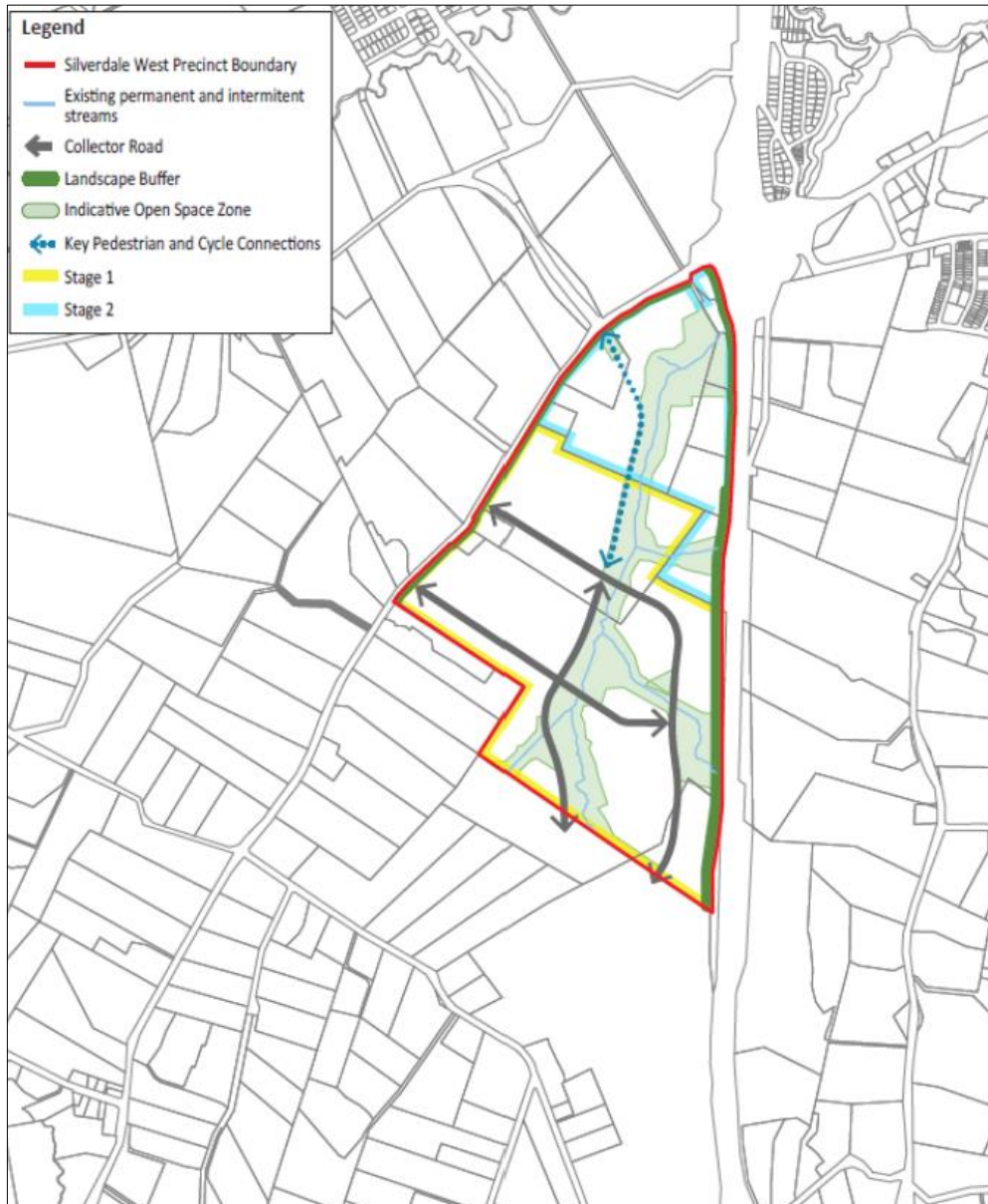


Figure 6: Silverdale West Precinct Plan.

A package of provisions, including policies, activity standards, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the

objectives of the precinct and the wider AUP. The full set of provisions is set out within Appendix 3 however a summary is provided below:

- A precinct-wide cap of 1,200m<sup>2</sup> on dairies and food and beverage activities
- A package of infrastructure (including transport infrastructure) and staging rules to coordinate particular transport infrastructure upgrades to be operational by the time a certain level of subdivision and development is reached within Silverdale West
- A rule restricting any development with direct vehicle access from the site to Dairy Flat Highway
- A road widening setback rule along Dairy Flat Highway to provide for future widening
- A height variation control to enable buildings up to 30m in low lying parts of the precinct
- Riparian planting rules requiring a 10m native vegetation riparian buffer each side of a permanent or intermittent stream, and 20m esplanade requirements each side of qualifying streams with an average width of 3m or greater
- Ecological offset provided for within the Precinct
- A rule requiring a planted setback along SH1 and Dairy Flat Highway
- A rule requiring contributions to the improvement of water quality, habitat, biodiversity and amenity within the precinct, particularly related to existing streams and natural inland wetlands
- A rule relating to the provision of wastewater and water infrastructure
- Additional assessment criteria for open space to ensure that the roading network integrates with natural features
- Measures to ensure no net increase in down and upstream flooding impacts during the 1% AEP flood event; and
- A road design rule and additional assessment criteria for the layout and design of roads to ensure a highly connected street layout that integrates with the wider area and provides for all modes of transport.

For completeness, while no Open Space zoning is proposed as part of the PPC, it is anticipated that a significant area of open space land will be established via subdivision processes, particularly along the esplanade and riparian areas adjacent to Johns Creek forming a “green spine” to the development. These areas are anticipated to fulfil amenity, ecological and stormwater management purposes and have been identified as ‘indicative open space zone’ within the precinct. The extent and ownership of any open space land will ultimately be dealt with as part of the future subdivision processes, and it will be up

to Council to undertake any necessary re-zoning of public land to Open Space following vesting.

## 6.2 PURPOSE AND REASONS FOR THE PLAN CHANGE

Clause 22(1) of the RMA requires that a PPC request explains the purpose of, and reasons for the proposed PPC.

The purpose of the PPC is to enable the provision of additional light industrial land in Silverdale West. The Applicants are the majority owners of the Plan Change area and intend to develop their landholdings in a manner consistent with the proposed zoning framework, which this PPC request will enable.

The PPC is consistent with the objectives of the Council's planning documents and, in this regard, the reasons for the PPC are justified and consistent with sound resource management practice.

## 7.0 DEVELOPMENT OF THE STRUCTURE PLAN AND PLAN CHANGE

### 7.1 THE COUNCIL'S SILVERDALE WEST STRUCTURE PLAN

In accordance with Policy B2.2.2(3) of the Regional Policy Statement, the proposed PPC has been prepared following the preparation of a Structure Plan that accords with the Structure Plan Guidelines at Appendix 1 of the AUP.

The Council's Silverdale West Structure Plan was in development for over two years. The Council has consulted with the public on the Structure Plan on two occasions:

- Issues and opportunities – December 2017- February 2018;
- Draft land use plan – March-April 2019.

The Silverdale West Structure Plan was adopted by the Council's Planning Committee on 30 April 2020 marking the end of the structure plan process.

The Silverdale West Structure Plan applies to the greater Silverdale West area as illustrated in **Figure 7** below, covering a total area of approximately 603-hectares. The Structure Plan document is included at **Appendix 4**.

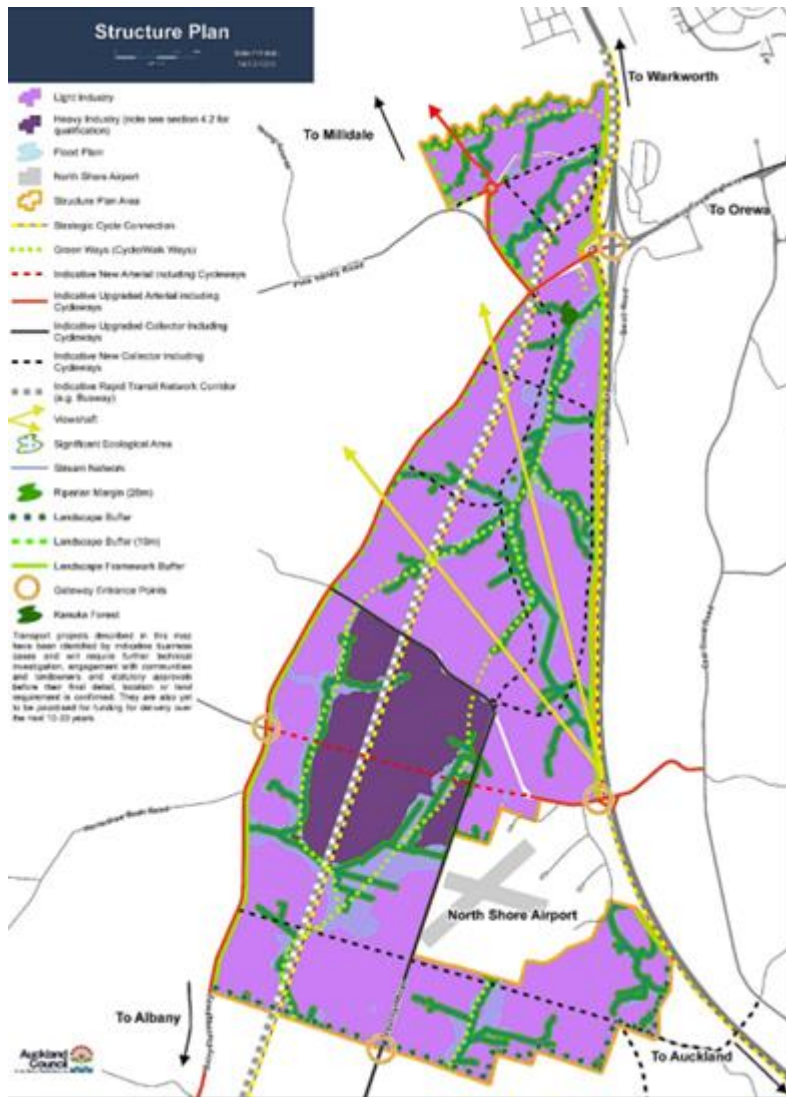


Figure 7: Silverdale West Structure Plan

The PPC request is largely consistent with Stage 1 of the Silverdale West Structure Plan Staging Plan (refer **Figure 8** below), the exceptions being that the land north of Dairy Flat Highway has not been included within the PPC, and the southern boundary of the Plan Change area extends slightly further to the south.



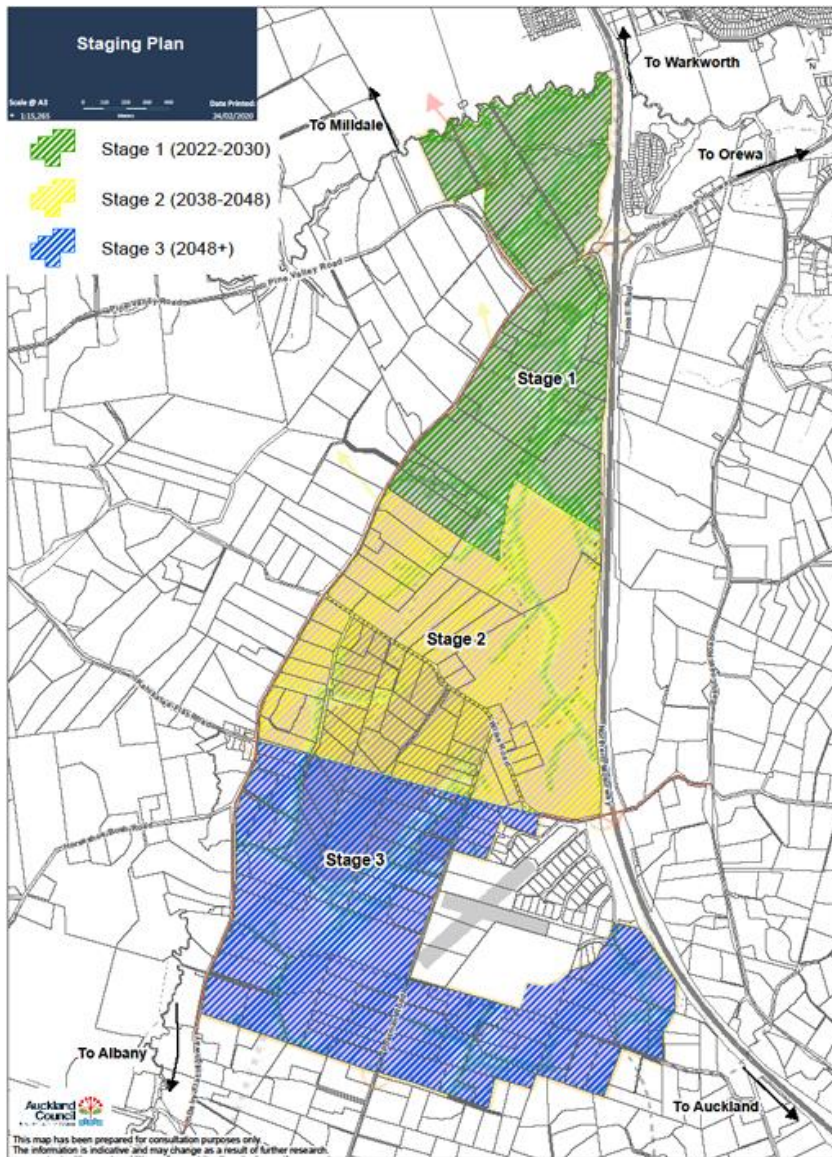


Figure 8: Silverdale West Structure Plan – Staging Plan

## 7.2 THE APPLICANTS' DEVELOPMENT CONCEPT PLAN

The applicant has undertaken more detailed planning of the Plan Change area to assist with translating the relatively high-level Silverdale West Structure Plan into a PPC with precinct provisions. The Development Concept Plan covers the same area as the PPC.

As part of the Development Concept Planning process, a comprehensive assessment of the land has been undertaken to determine the constraints and opportunities within the Plan Change area and to identify the most logical and desirable development pattern. This process has resulted in the Development Concept Plan (refer **Figure 9**).

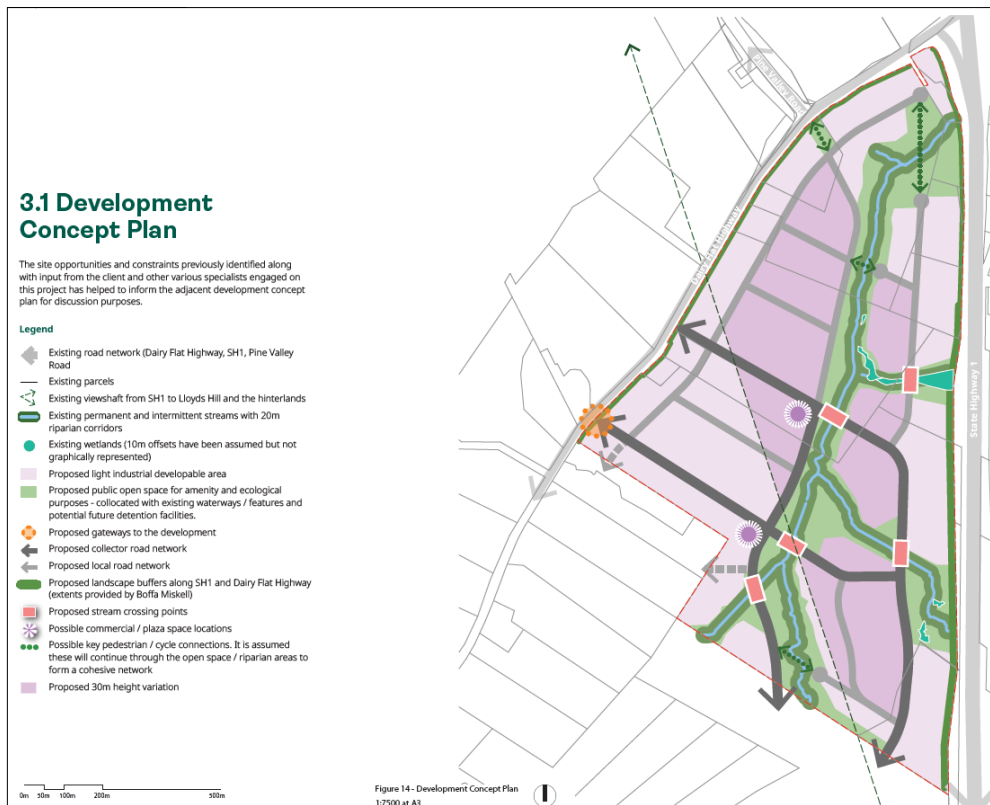


Figure 9: Silverdale West Development Concept Plan

The Development Concept Plan provides indicative collector roading patterns, positioning of key access points, roading connections and indicative public open areas where greater height can be enabled. The proposed zoning pattern for the Plan Change area has been informed broadly by the Silverdale West Structure Plan, and specifically by the Development Concept Plan.

## 7.3 CONSULTATION AND ENGAGEMENT

### Engagement with Mana Whenua

In respect of Mana Whenua, engagement correspondence was sent to 12 iwi groups in late 2022 seeking confirmation as to whether they wanted to attend a hui on a private plan change relating to Silverdale West. Ngāti Maru responded confirming their interest in being involved.

A hui was held on the 16 December 2022. The minutes are attached as part of the consultation summary in **Appendix 19**. The Ngāti Maru representative asked broad questions in regard to John Creek, riparian margins and the indicative viewshaft from SH1. They also confirmed that no Cultural Values Assessment would be required for the PPC, and instead agreed an approach to continue engaging directly with the applicant.

For completeness, and while not specifically relevant to the PPC, Auckland Council undertook extensive engagement with Mana Whenua during the development of the Silverdale West Structure Plan (circa 2017-2020). The publicly available outcomes of that engagement have been reviewed by the applicant in the development of the PPC.

#### Community engagement

In terms of public consultation, a public drop-in session was held at the Dairy Flat Community Hall on Wednesday 30 November 2022 between 3:00pm and 7:00pm. The purpose of the sessions was to gain feedback on the proposed land use scenarios, infrastructure and roading initiatives, development concepts, and to provide opportunities to better understand views of the local Dairy Flat community. A series of display panels were displayed on the day, to set out key information for the public. Attendees were able to view the displays boards and discuss any issues or aspects of the project with the applicant and key consultants including traffic, urban design, and planning consultants.

While different views are held within the community, the following key themes have come through in the consultation:

- Broad interest in when services will be upgraded through the wider area
- Support for the PPC generally, noting a minor concern around noxious air discharges
- Interest in the (at the time) recently revised location of the Strategic Growth Alliance Rapid Transit Network – North, which is currently anticipated to run through properties to the west of Dairy Flat Highway rather than through the Silverdale West land. It was noted that this was not a result or associated with the Silverdale West proposition, or something that the Silverdale West applicant or consultant team could actively discuss, and that was acknowledged
- Some landowners within or nearby the Plan Change area were against it in general terms, but raised no specific concerns.

A summary of the discussion from the consultation event is included at **Appendix 20** to this report. The Applicants are willing to continue to work with stakeholders as the project progresses. Notwithstanding that, the submission process will enable the views of the community to be expressed.

As noted above, and while not specifically in relation to the PPC, Auckland Council undertook extensive engagement community engagement during the development of the Silverdale West Structure Plan (circa 2017-2020). The publicly available outcomes of that engagement have been reviewed by the applicant in the development of the PPC.

## 7.4 ACCEPTING THE PLAN CHANGE REQUEST

The Council has discretion to accept or reject a Plan Change request in accordance with Clause 25 of Schedule 1 of the RMA, subject to the matters set out in Clause 25(4)(a)-(e). Given that the AUP has now been operative for more than two years, the Council is able to reject the Plan Change request only on the following grounds:

- The Plan Change request is frivolous or vexatious (clause 25(4)(a));
- The Plan Change request is not in accordance with sound resource management practice (clause 25(4)(c)); or
- The Plan Change request would make the plan inconsistent with Part 5 – Standards, Policy Statements and Plans (clause 25(4)(d)).

In relation to (a), considerable technical analysis has been undertaken to inform the PPC request, which is detailed in the report below. For this reason, the proposal cannot be described as frivolous or vexatious.

In relation to (c), ‘sound resource management practice’ is not a defined term under the RMA, however, previous case law suggests that the timing and substance of the plan change are relevant considerations. This requires detailed and nuanced analysis of the proposal that recognises the context of the plan change area and its specific planning issues.

In this context, the PPC is considered to be in accordance with sound resource management practice for the following reasons:

- The proposed zoning supports a compact urban form and integrated urban development;
- The proposed zoning is broadly consistent with that shown in the Silverdale West Structure Plan, which was informed by detailed technical analysis in line with AUP Appendix 1 guidelines;
- While the Future Development Strategy (**draft FDS**) indicates that the proposed timeframe for when the infrastructure required to service the full build out of Silverdale West Stage 1 is likely to be 2030+, in this case the necessary infrastructure requirements to support development within the Plan Change area have been identified through supporting technical analysis and can be met privately;
- All necessary statutory requirements have been met, including an evaluation in accordance with section 32 of the RMA with supporting evidence, and consultation with interested iwi is on-going; and
- The PPC is considered to be consistent with the sustainable management purpose of the RMA as discussed in the report below.



In relation to (d), given that the majority of the Plan Change area has been identified for future business use in the Council's FULSS, then the proposed zoning is not inconsistent with Part 5.

On this basis, the merits of the proposal should be allowed to be considered through the standard Schedule 1 process.

## 8.0 STATUTORY CONSIDERATIONS

This report has been prepared in accordance with the requirements of Clause 22 of Schedule 1 of the Resource Management Act 1991 (RMA), which states:

### 22 *Form or request*

- (1) *A request made under clause 21 shall be made to the appropriate local authority and shall explain the purpose of, and reasons for, the proposed plan or change to a policy statement or plan and contain an evaluation report prepared in accordance with section 32 for the proposed plan or change.*
- (2) *Where environmental effects are anticipated, the request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan.*

Section 32 of the RMA sets out the requirements for an evaluation report as follows (emphasis added):

### 32 *Requirements for preparing and publishing evaluation reports*

- (1) *An evaluation report required under this Act must-*
  - (a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
  - (b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by-*
    - (i) *identifying other reasonably practicable options for achieving the objectives; and*
    - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
    - (iii) *summarising the reasons for deciding on the provisions; and*
  - (c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.*
- (2) *An assessment under subsection (1)(b)(ii) must-*
  - (a) *identify and assess the benefits and costs of the environmental, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for-*
    - (i) *economic growth that are anticipated to be provided or reduced; and*
    - (ii) *employment that are anticipated to be provided or reduced; and*

(b) *if practicable, quantifying the benefits and costs referred to in paragraph (a);  
and*

(c) *assess the risk of acting or not acting if there is uncertain or insufficient  
information about the subject matter of the provisions.*

(3) ...

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA.

## 9.0 STRATEGIC PLANNING FRAMEWORK

A number of strategic and statutory planning documents have informed the development of the PPC request. This section provides a summary of those documents.

### 9.1 NATIONAL POLICY DOCUMENTS

#### 9.1.1 The National Policy Statement – Urban Development

The National Policy Statement on Urban Development 2020 ('NPS-UD') came into force on 20 August 2020. The NPS-UD has assessed all the local authorities within the country and classified them as either Tier 1, Tier 2 or Tier 3, with Tier 1 referencing the largest local authorities in New Zealand (including Auckland Council). The NPS-UD provides direction to decision-makers under the RMA on planning for urban environments.

##### *Well-Functioning Urban Environment*

Under Policy 1 planning decisions must contribute to well-functioning urban environments. Policy 1 defines this as follows (**emphasis added**):

- (a) *have or **enable a variety of homes that:***
  - (i) *meet the needs, in terms of type, price, and location, of different households; and*
  - (ii) *enable Māori to express their cultural traditions and norms; and*
- (b) *have or **enable a variety of sites that are suitable for different business sectors in terms of location and site size; and***
- (c) *have **good accessibility for all people** between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *support, and **limit as much as possible adverse impacts on, the competitive operation of land and development markets; and***
- (e) *support **reductions in greenhouse gas emissions; and***
- (f) *are **resilient to the likely current and future effects of climate change.***

The components of a well-functioning urban environment that the Silverdale West Precinct will support include:

- Enabling a variety of sites that are suitable for industry in an area which is located away from the typically more sensitive residential zoned land and located directly adjacent to SH1, a major arterial providing direct access to Auckland city centre and the northern regions.
- Promoting good accessibility between housing, jobs, community services and open spaces by enabling more people to work in accessible locations close to where they

live, public and active transport, which also supports a reduction in greenhouse gas emissions through reduced car dependence;

- Supporting the competitive operation of land and development markets by providing a broadly enabling zone framework and providing flexibility for the market to take up those opportunities; and
- Being resilient through the likely current and future effects of climate change through flooding and promoting a compact and efficient urban form.

#### *Development Capacity*

Under Policy 2 Tier 1 authorities are required to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. The PPC will enable the development of an additional 83.38 hectares of land for light industrial activity, significantly adding to Auckland’s development capacity within the North. The propensity for this development to occur is markedly higher because the zoning is being proposed, planned and in large part delivered by a group of nationally recognised, credible developers with track records of delivering new large-scale communities. Therefore, the PPC will make a significant contribution to realisable development capacity and competitive land markets. This will better enable the Council to meet Policy 2.

#### *Planned Urban Built Form and Amenity Values*

Objective 4 seeks that New Zealand’s urban environments develop and change over time in response to the diverse and changing needs of people, communities and future generations. Section 7(c) of the RMA requires particular regard to be had to the maintenance and enhancement of amenity values. Policy 6 of the NPS-UD now clarifies s7(c) of the RMA through focusing on the amenity values of the wider community and future generations and acknowledging that significant change within an area is not in itself an adverse effect.

The PPC will enable urban industrial development within an area which is currently rural in character. This will result in significant change over time in the rural character and may detract from the current amenity values currently enjoyed by some residents. The PPC will enable a different set of amenity values to be realised over time, when compared to those currently associated with rural environments. In particular, the amenity values offered within an industrial area include more employment areas with which can be accessed by the surrounding residential areas currently under development.

#### *Responsive Planning*

Local authority decisions are required to ensure development is integrated with infrastructure planning and funding as well as being responsive, particularly in relation to proposals that would add significantly to development capacity and add to well-functioning urban environments even if the development capacity is unanticipated by RMA planning documents or is out of sequence with planned land release (Objective 5 and Policy 6).

As discussed in Section 9.2.1, the urbanisation of land within the Plan Change area is not in sequence with the FDS which indicates a 2030+ timeline for implementation of infrastructure to support development within Silverdale West. The more detailed technical analysis undertaken by Stantec, and Civix has confirmed that capacity, or an infrastructure solution, exists to enable development within the Plan Change area ahead of 2030 sequencing. The PPC includes all necessary infrastructure upgrades as prerequisites to development within the Plan Change area, ensuring that no burden associated with bringing the implementation of Silverdale West Stage 1 forward falls on the Council.

The Economic Assessment has identified a critical shortage of industrial zoned land in the area. Bringing forward the sequencing of the Plan Change area will assist with providing industrial land to satisfy demand for industrial land over the short-medium. This in turn will contribute to a well-functioning urban environment through providing employment opportunities reducing the need for some people to travel outside the wider Silverdale / Dairy Flat / Hibiscus Coast areas, area for work.

#### *Reduction in Greenhouse Gas Emissions*

Objective 8 supports a reduction in greenhouse gas emissions and resilience to the current and future effects of climate change. The PPC will release the first stage of land within the Silverdale West area for industrial development. The Plan Change area is currently zoned Future Urban and therefore has already been identified by Council as being appropriate for urbanisation through its Future Urban zoning. Therefore, in respect of how the proposed zone and precinct provisions will facilitate urban development that achieved Objective 8 of the NPS-UD, the following is noted:

- The PPC proposes a comprehensive and integrated development over a large land holding that is adjacent to existing urban (primarily residential) development in Silverdale. The proposed development will enable employment opportunities that can be accessed via public and active modes of transport from the surrounding residential communities such as Milldale to the north. This creates opportunities for residents to live and work closer to home, thereby reducing the need for travel to other areas; and
- There is currently little transport choice within the Plan Change area as roads are rural arterials with no provision for footpaths and cycling. The PPC provides an opportunity to increase use of public and active modes of transport as urbanisation of the Plan Change area upgrades roads to provide for walking and cycling infrastructure and generates more public transport demand from employees.

#### *Summary*

Overall, it is considered that the Silverdale West Structure Plan gives effect to the NPS:UD.

### 9.1.2 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement 2010 ('NZCPS') contains objectives and policies relating to the coastal environment to achieve the purpose of the RMA. Notwithstanding that the Waitemata Harbour is the ultimate receiving environment for stormwater flows from the Plan Change area, the NZCPS is not relevant to the PPC.

### 9.1.3 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('NPS-FM') sets a national policy framework for managing freshwater quality and quantity. Of relevance to the PPC, the NPS-FM seeks to:

- *Manage freshwater in a way that 'gives effect to Te Mana o te wai through involving tangata whenua, and prioritising the health and wellbeing of water bodies, then the essential needs of people, followed by other uses.*
- *Improve degraded water bodies.*
- *Avoid any further loss or degradation of wetlands and streams.*
- *Identify and work towards target outcomes for fish abundance, diversity and passage and address in-stream barriers to fish passage over time.*

It is proposed to apply the Stormwater Management Area Control – Flow 1 ('SMAF 1') across the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. Accordingly, an integrated stormwater management approach has been proposed and a number of best practicable options have been identified in the SMP included at **Appendix 10**. The SMP incorporates a range of measures to manage potential effects on water quality and quantity associated with the proposed change in land use.

A series of permanent and intermittent streams and wetlands have been identified by RMA Ecology (refer to **Appendix 8**) within the Plan Change area. All stream tributaries within the Plan Change area are highly eroded and degraded. The management of the effects of development within the Precinct on those streams and wetlands primarily falls to the NES-FW and the existing Auckland-wide provisions of the AUP (including Chapter E3 – Lakes, Rivers, Streams and Wetlands, and Chapter E15 – Vegetation Management and Biodiversity).

The PPC will however result in improvements to the overall health of streams and wetlands within the Precinct through the requirements for Riparian enhancement along the identified streams.

It is considered that the implementation of the stormwater management toolbox in conjunction with the enhancement of riparian margins will be sufficient to manage the potential effects associated with changes in water quality and as measured by the macroinvertebrate community indices. Overall, RMA Ecology conclude that *"The overall outcome from the proposed PPC will be a clear, positive, net-benefit for indigenous*

*biodiversity values and ecological services, the spans of waterways, wetlands, wildlife habitat and native revegetation.”*

To facilitate urban development of the land, some stream reclamation may be necessary to construct roads. The effects of reclamation and the adequacy of the mitigation or compensation proposed will be considered as part of the resource consent process under the existing Auckland-wide AUP provisions. Where any stream reclamation is required which may result in loss of stream habitat, the effects may be offset through enhancement of other sections of streams within the Plan Change area, or off site as provided for under the AUP, to ensure no net loss is achieved.

The proposed measures to address any effects on freshwater are discussed in greater detail in Section 9.

#### **9.1.4 National Policy Statement for Highly Productive Land**

The National Policy Statement for Highly Productive Land (**'NPS-HPL'**) came into effect on 17 October 2022. The NPS-HPL does not apply to existing urban areas and land that Councils have identified as future urban zones in district plans.

As the Plan Change area is currently within the Future Urban Zone, the provisions of the NPS-HPL do not apply.

#### **9.1.5 National Planning Standards**

The National Planning Standards came into effect on 5 April 2019. These codify the structure, mapping, definitions and noise/vibration metrics of District, Regional and Unitary Plans. Auckland Council has 10 years to implement these changes and has not yet done so. This PPC applies the standard AUP zone and rule framework to the Plan Change area, which is broadly consistent with the planning standards.

#### **9.1.6 National Policy Statement for Indigenous Biodiversity**

The National Policy Statement for Indigenous Biodiversity (**'NPS-IB'**) which sets out the objectives and policies to identify, protect, manage and restore indigenous biodiversity under the RMA.

In broad terms, the NPS-IB requires every territorial authority to undertake a district-wide assessment in accordance with Appendix 1 of the NPS-IB to determine areas of significant indigenous vegetation and / or significant habitat of indigenous fauna.

The Silverdale West Plan Change area is primarily used for farming activity at present. The land has been historically cleared for pasture and has been intensively worked for many years. While the majority of indigenous vegetation has long been removed, RMA Ecology has identified two areas (referenced within the Ecology Assessment as IV1 and IV2) of established kanuka forest along the margins of Johns Creek, and one area (IV3) where indigenous vegetation has been planted along a drain. RMA Ecology considers that IV1



meets the criteria for the identification of Significant Ecological Areas (SEAs) in Schedule 3 of the AUP(OP) (Policy B7.2) and is considered to be an area of significant indigenous vegetation. Areas IV2 and IV3 do not meet the criteria and are not considered to be areas of significant indigenous vegetation.

### 9.1.7 National Environmental Standards

The National Environmental Standards ('NES') that are relevant to the PPC include:

- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011('NESCO'); and
- NES for Freshwater 2020 ('NES-FW').

These NES documents have been taken into account in the preparation of the relevant expert reports and are further discussed in Section 9 of the report below. Assessments undertaken to date confirm that the NESCO will apply at the time of development to manage contaminated land, to be appropriately addressed as part of future resource consent processes. As discussed above, the delivery of key structuring elements within the Plan Change area is unlikely to require resource consent under the NES-FW, however the relevant regulations will apply at the time of future development and will also be appropriately assessed through future resource consent processes.

## 9.2 AUCKLAND COUNCIL STRATEGIC PLANS

### 9.2.1 The Auckland Future Development Strategy

In November 2023 the Council adopted the Auckland Future Development Strategy 2023 (FDS) which replaces both the Auckland Plan Development Strategy and the Future Urban Land Supply Strategy 2017. The FDS incorporates a strategic spatial framework which identifies spatial outcomes and principles for growth and change which underpin and inform the spatial response. To achieve a well-functioning urban environment with a quality compact urban form the following principles are identified:

- (a) Principle 1: Reduce greenhouse gas emissions
- (b) Principle 2: Adapt to the impacts of climate change
- (c) Principle 3: Make efficient and equitable infrastructure investments
- (d) Principle 4: Protect and restore the natural environment
- (e) Principle 5: Enable sufficient capacity for residential and business growth in the right place at the right time

#### *FDS – Strategic Spatial Framework*

The Structure Plan is consistent with the spatial principles. In particular:

- (a) The PPC proposes development that will contribute to a reduction in greenhouse gas emissions by proposing a comprehensive and integrated development over a large land holding that is contiguous with the existing urban development in Silverdale. The development will provide employment and economic development opportunities reducing the need for some people to travel outside the wider Silverdale / Dairy Flat / Hibiscus Coast areas, area for work. It will also incorporate an extensive network of pedestrian and cycle paths as well as ensuring the collector Road network can accommodate buses to support a shift to public and active modes. The native riparian margins and planting ecological corridors and a network of street trees will contribute to an offset in carbon emissions from the development.
- (b) The Flooding Assessment has assessed the potential for natural hazards which will be exacerbated by climate change. The flood modelling has confirmed that the development of the Plan Change area will not significantly affect water levels on downstream properties in the 1% AEP storm event with proposed mitigation in the form of the drainage reserve and artificial wetlands.
- (c) As outlined further below future growth enabled by the Plan Change can be efficiently serviced by infrastructure and funding solutions are available.
- (d) The Plan Change will protect and restore the natural environment through the planting, protection and restoration of riparian margins.
- (e) The Economic Assessment undertaken to inform the Plan Change has identified a critical shortage of industrial zoned land in the area. The Plan Change will provide industrial land to satisfy demand for industrial land over the short-medium.

*FDS – Spatial Response*

The FDS spatial response is underpinned by a continuation of the quality compact approach to accommodate growth as set out in the principles for growth and change discussed above. The FDS identifies four main spatial environments being existing urban, future urban, rural and business areas. The Plan Change area falls within the future urban area as it is zone Future Urban in the AUP.

The spatial response seeks to:

- (a) Focus growth within the existing urban area at a regional level;
- (b) Move towards a multi nodal model which grows the roles of Albany, Westgate and Manukau in relation to sub-regional sustainability at a sub-regional level; and
- (c) Neighbourhoods will offer a wider range of services and non-residential land uses to create greater sustainability at a local scale.

The PPC is consistent with the spatial response at a regional, sub-regional and local level for the following reasons:

- (a) The regional focus for growth seeks to phase growth in future urban areas over an extended timeframe. The PPC will provide additional industrial capacity which

economic analysis has identified is required within the northern area over the short -medium term. The PPC has been informed by detailed technical analysis which has identified infrastructure solutions to enable urbanisation, which can be funded by the applicants.

- (b) The Plan Change area is well connected to both the City Centre and the Albany Centre node via public transport. The PPC will support the growth of the Albany node, through providing an increased number of industrial employees within 15minutes of Albany.
- (c) The PPC will also support residential development within the wider Silverdale / Dairy Flat / Hibiscus Coast areas, through providing local employment opportunities.

#### *Silverdale West FUZ and Infrastructure Triggers*

The FDS proposes to sequence development within Silverdale West for 2030+. The FDS identifies a number of infrastructure prerequisites, required to support development readiness in areas zoned Future Urban. The FDS identifies the following key bulk infrastructure projects as necessary to support development in Silverdale West:

- Pine Valley Road upgrade;
- SH1 interchange upgrades and new interchanges including active modes (Wilks Road, Redvale and Silverdale);
- North Shore Rapid Transit (extension to Milldale);
- Army Bay Wastewater Treatment Plant Upgrade; and
- Silverdale West Centralised WW PS.

The analysis to inform the Silverdale West infrastructure prerequisites is coarse and high level. Both the more detailed Integrated Transport Assessment, prepared by Stantec, and the water and wastewater servicing strategy prepared by Civix have confirmed that capacity, or an infrastructure solution, exists to enable development proposed within the Plan Change area to commence ahead of 2030 sequencing. If development occurs prior to the Council providing the necessary infrastructure upgrades, the Applicants have confirmed that they are capable and willing to cover those costs up front and will seek to enter into agreement(s) with Council to recover some of those costs over time where there is a wider public benefit from the provision of that infrastructure (refer **Appendix 22**). Further, the proposed precinct provisions including the trigger rules and monitoring requirements ensure that the Council maintains the ability to control further growth if the necessary infrastructure upgrades are not in place and coordinate development capacity with the required transport upgrades to service development.

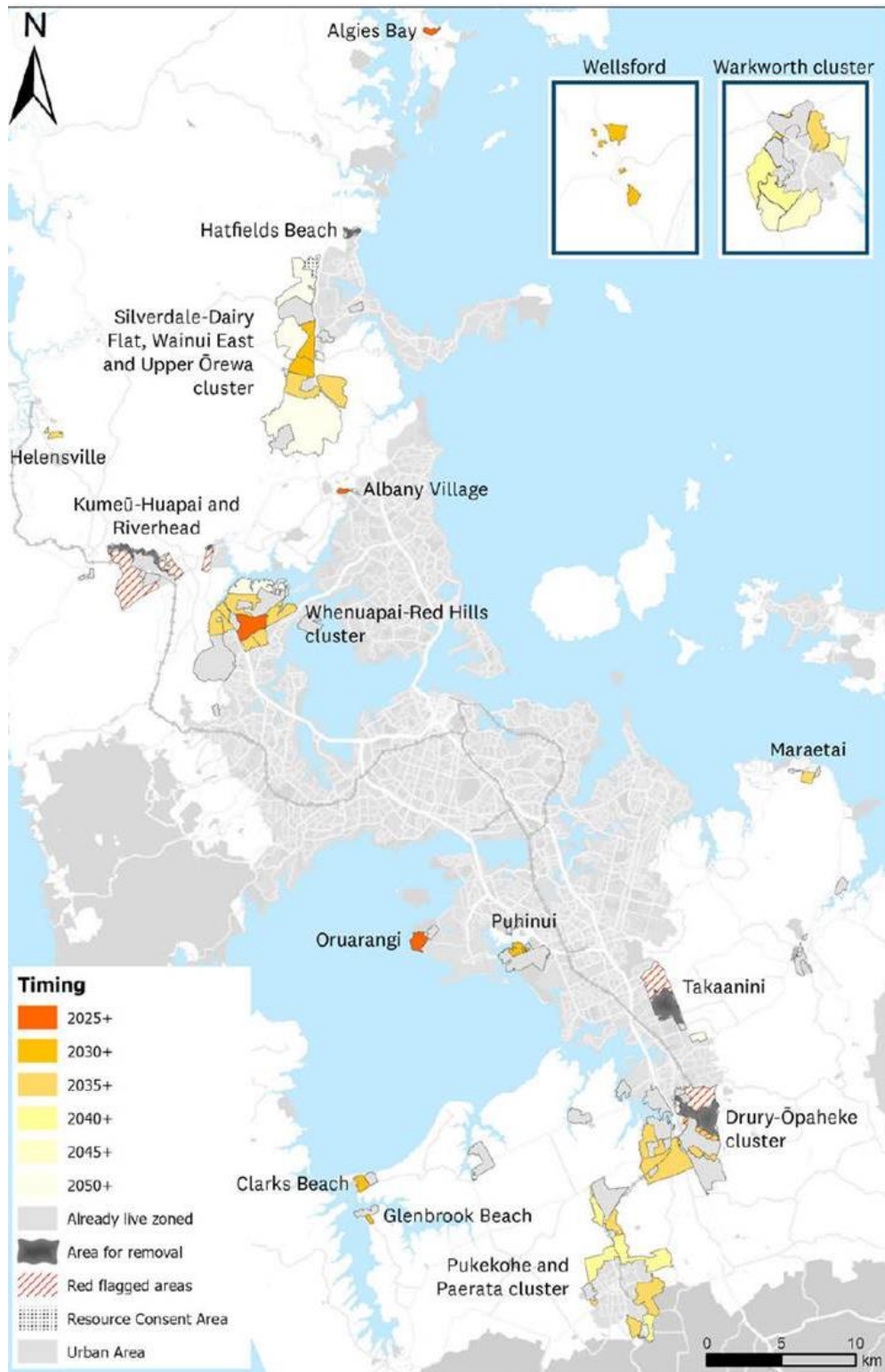


Figure 10: Auckland Future Development Strategy – Future Urban Zone Sequencing

## 9.3 REGIONAL POLICY STATEMENT AND PLANS

### 9.3.1 Auckland Unitary Plan (Operative in Part)

The AUP is the primary statutory planning document for Auckland. It comprises the Regional Policy Statement, Regional Coastal Plan, Regional Plan and District Plan. The AUP provides the regulatory framework for managing Auckland’s natural and physical resources while enabling growth and development and protecting matters of national importance.

The RPS sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. The RMA establishes that a District Plan must give effect to any RPS<sup>1</sup>, and must not be inconsistent with a Regional Plan<sup>2</sup> for any matter specified in Section 30(1).

Council has recently released its decision on Plan Change 80 (“PC80”) to the RPS, which represents the Council’s up to date policy position on matters relating to well-functioning urban environments, climate change, resilience to the effects of climate change and qualifying matters. PC80 is subject to appeal. Importantly, the Council did not address the following matters in PC80 set out in the NPSUD which are relevant to the PPC, meaning that reference back to the NPSUD is still required for the objectives and policies relating to:

- (a) Responsive planning (Policy 8), which is not addressed at all in the RPS.
- (b) Demand and capacity (Policy 2), noting that there are policy differences between the RPS and the NPSUD.
- (c) Responding to changing amenity values (Policy 6).
- (d) Greenhouse gas emissions, which are not addressed at all in the RPS, although some policies do support this obliquely as they relate to urban form and transport.

This report and appendices reference the Decisions Version of PC80, where relevant.

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS is provided at **Appendix 5**. This demonstrates that the proposed rezoning will give effect to the RPS.

Of particular relevance to this PPC is section B2 of the RPS, which identifies the issues, objectives and policies governing urban growth and form within the Auckland Region. A detailed assessment of these objectives and policies is provided below:

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<sup>1</sup> RMA, section 75(3)(c)

<sup>2</sup> RMA, section 75(4)(b)

## 9.3.2 B2.2 Urban Growth and Form

### **B2.2.1 Objectives**

(1A) *A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

(1) *A well-functioning urban environment with a quality compact urban form that enables all of the following:*

- (a) *a higher-quality urban environment;*
  - (b) *greater productivity and economic growth;*
  - (c) *better use of existing infrastructure and efficient provision of new infrastructure;*
  - (d) *good accessibility for all people, including by improved and more effective efficient public or active transport;*
  - (e) *greater social and cultural vitality;*
  - (f) *better maintenance of rural character and rural productivity; ~~and~~*
  - (g) *reduced adverse environmental effects; and*
  - (h) *improved resilience to the effects of climate change.*
- (2) *Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).*
- (3) *Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.*
- (4) *Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.*
- (5) *The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages*
- (a) *Is integrated with the provision of appropriate infrastructure; and*
  - (b) *Improves resilience to the effects of climate change.*

### **B2.2.2 Policies**

*Development capacity and supply of land for urban development*

- (1) *Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' projected growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.*
- (2) (a)-(i) *Not applicable*

- (3) Enable rezoning of future urban zoned land for urbanisation following structure planning and Plan Change processes in accordance with Appendix 1 structure plan guidelines.

Quality compact urban form

- (4) Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns and rural and coastal towns and villages, in a way that contributes to a well-functioning urban environment and avoid urbanisation outside these areas.

- (5) Enable higher residential intensification:

- (a) in and around centres;
- (b) along identified corridors; and
- (c) close to public transport, social facilities (including open space) and employment opportunities.

- (6) Identify a hierarchy of centres that contributes to a well-functioning urban environment which supports a quality compact urban form:

- (a) at a regional level through the city centre, metropolitan centres and town centres which function as commercial, cultural and social focal points for the region or sub-regions; and
- (b) at a local level through local and neighbourhood centres that provide for a range of activities to support and serve as focal points for their local communities.

- (7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that contribute to a well-functioning urban environment and that do all of the following:

- (a) support a quality compact urban form;
- (b) provide for a range of housing types and employment choices for the area;
- (c) integrate with the provision of infrastructure; ~~and~~  
(ca) provide good accessibility, including by way of efficient and effective public or active transport.  
(ca) incorporate improved resilience to the effects of climate change;
- (d) follow the structure plan guidelines as set out in Appendix 1-; and
- (e) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.

- (8) Enable the use of land zoned future urban within the Rural Urban Boundary or other land zoned future urban for rural activities until urban zonings are applied, provided that the subdivision, use and development does not hinder or prevent the future urban use of the land.

- (9) Not applicable



The PPC is considered to give effect to the above relevant Urban Growth and Form objectives and policies for the following reasons:

- The PPC supports a well-functioning urban environment with a quality compact urban form, by enabling urbanisation of land that is immediately adjacent to the existing Silverdale urban area and contained within the existing Rural Urban boundary. The proposed zoning pattern will enable employment opportunities in an area that is serviced by public transport and with a growing residential catchment to support compact urban form outcomes
- The PPC provides increased opportunities for residents in nearby communities to work locally. This may contribute to greater social and cultural vitality through reduced commute times, resulting in more time to invest in their families and local communities, whether it be volunteering, collecting their children from school, playing sport in a local team, etc. In this regard, the PPC gives effect to Objective B2.2.1(e)
- The PPC has been informed by the Silverdale West Structure Plan which has been developed in accordance with the structure plan guidelines set out in Appendix 1 and therefore gives effect to Policy B2.2.7(d)
- The Plan Change area can be serviced by the water and wastewater network with upgrades planned, able to be provided or in place. The Integrated Transport Assessment demonstrates that the land can be developed, also with targeted roading infrastructure upgrades planned, able to be provided or in place. The PPC includes infrastructure-related provisions to ensure the provision of infrastructure is coordinated with development and therefore gives effect to Policy B2.2.7(c); and
- The development will provide for greater productivity and economic growth through the provision of much needed additional industrial capacity and within the north. This gives effect to Objective B2.2.1(3) and Policy B2.2.2(1).

### 9.3.3 Strategic Growth Network North and Notices of Requirement

To support urban growth within north Auckland the Strategic Growth Alliance are proposing long-term transport projects. Notices of Requirement have been notified to protect land for the following future strategic transport projects:

1. A new Rapid Transit Corridor (RTC) between Albany and Milldale, including new walking and cycling path
2. New stations at Milldale with associated facilities.
3. New station at Pine Valley East with associated facilities.
4. Improvements to State Highway 1 (SH1) between Albany and Ōrewa
5. New SH1 crossing at Dairy Stream – providing a new east-west crossing of SH1
6. New connection between Milldale and Grand Drive



7. Upgrade to Pine Valley Road between the rural urban boundary and Argent Lane
8. Upgrade to Dairy Flat Highway between Silverdale and Dairy Flat
9. Upgrade to Dairy Flat Highway between Dairy Flat and Albany
10. Upgrade to Wainui Road between Lysnar Road and SH1.
11. New connection between Dairy Flat Highway and Wilks Road
12. Upgrade and extension to Bawden Road
13. Upgrade to East Coast Road between Silverdale and Ō Mahurangi Penlink (Redvale) Interchange

The majority of these projects are yet to be funded for delivery. The detailed transport analysis however, undertaken by Stantec in support of the PPC identifies the specific transport upgrades required to support development of the Plan Change area. While the strategic growth network for the north will support development within the Plan Change area the PPC is not reliant on its delivery.

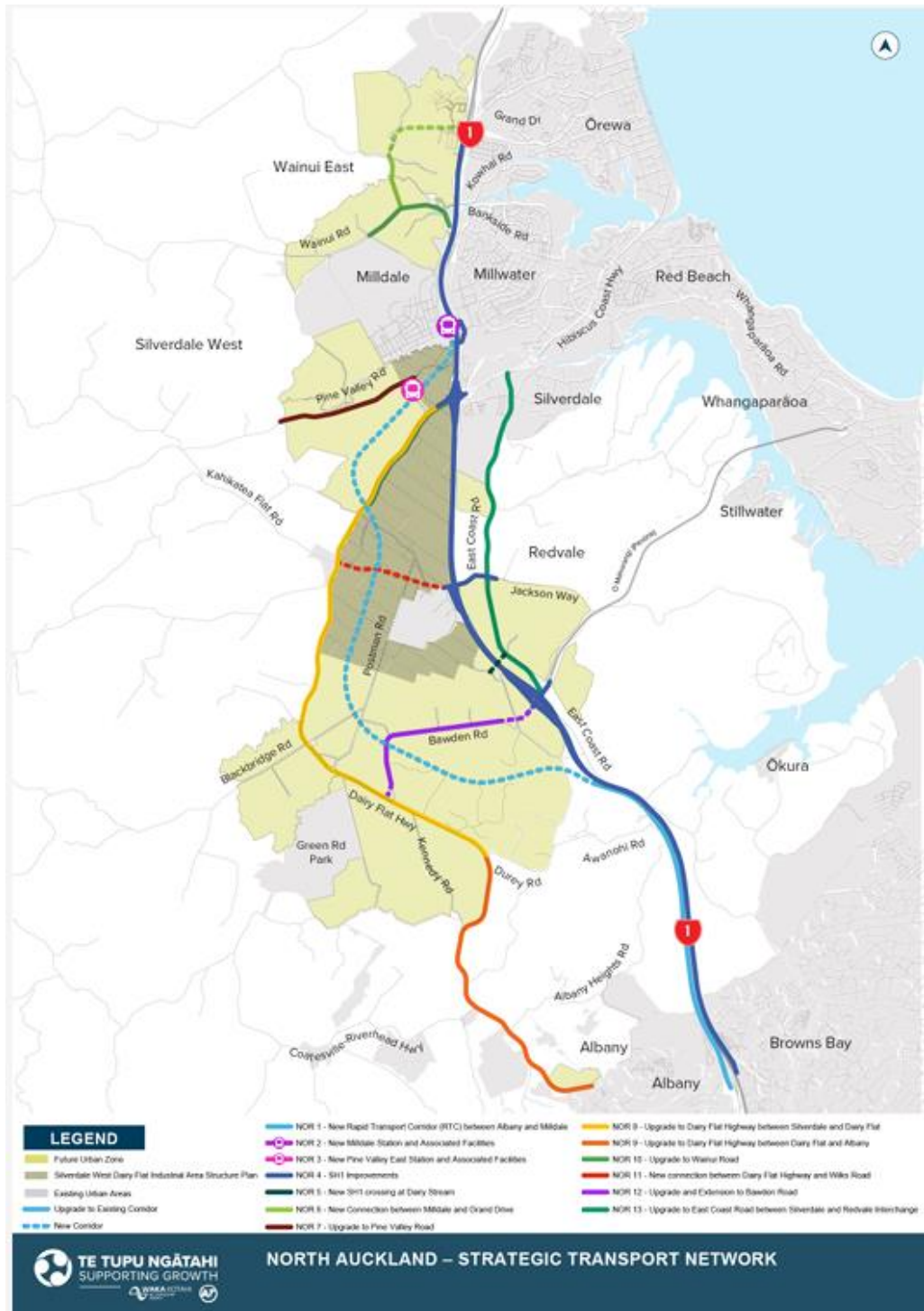


Figure 11: North Auckland Strategic Growth Network

#### 9.3.4 Iwi Planning Documents

Ngāti Manuhiri, Ngāti Rehua, Te Kawerau ā Maki, Te Rūnanga o Ngāti Whātua, and Ngāti Whanaunga expressed an interest in the Silverdale West Structure Plan. Accordingly, the relevant iwi management plans are considered to be:

Kawerau ā Maki Trust: Resource Management Statement (1995) sets out goals and concerns in regard to the sustainable management of taonga within Te Kawerau’s tribal area. The document is recognised under sections 66(c) and 74(b) of the Resource Management Act 1991.

Central concepts of sustainable management are referred to in the document, with associated objectives and policies outlined. Central matters include:

- Provision for the social, economic and cultural well-being of Te Kawerau.
- Heritage (Te Kawerau history, culture, traditions, tikanga, place names, artefacts, wāhi tapu and historic places and areas)
- Kōiwi (human remains) and artefacts unearthed through earthworks and/or erosion
- The mauri (life force) of all natural waterways
- The coastal marine area
- Waste (wastewater, landfill/solid waste, waste via stormwater)
- Land and landscape values
- Flora and fauna
- Design (building architecture (particularly civic buildings), public areas,

These matters are responded to in section 10.10 on Cultural Values.

## 10.0 ASSESSMENT OF EFFECTS

Section 76 of the RMA states that in making a rule, the territorial authority must have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect. This section details the actual and potential effects that the proposed PPC provisions may have on the environment. This assessment is based on analysis and reporting undertaken by various experts, which are attached as appendices to this report.

### 10.1 URBAN FORM, LANDSCAPE AND VISUAL AMENITY

Ultimately, the built form across the Plan Change area will be guided by the established provisions of the Light Industry Zone and the activities enabled under that zone. There are a number of factors relating to the function and amenity of the Precinct working together across the Plan Change area that will collectively contribute to the built form outcomes of Silverdale West. These include:

- key intersection locations to Dairy Flat Highway
- the overall block structure being enabling of light industrial land use
- working with the topography to ensure light industrial activity is enabled while ensuring a positive interface with roads and other public spaces; and
- ensuring road design offers good levels of functionality and amenity to encourage active mode uptake.

The PPC request seeks to embed a small number of site-specific urban form and landscape outcomes within the relevant Plan provisions, relating to the following matters:

- Block structure
- Roading hierarchy, green corridors and contribution to active modes outcomes
- Height variation to 30m in low-lying areas; and
- Landscaped buffers to the SH1 and Dairy Flat Highway frontages.

These items are largely consistent with the outcomes envisaged by the Structure Plan and are discussed below.

#### *Block structure*

In undertaking the Development Concept Plan design process, the applicants have been cognisant of the needs of the light industrial land use that will ultimately occupy the land. An indicative subdivision layout has been informed by generic industrial block structure, and has been refined on the basis of topography, natural features such as streams and wetlands, and the requirements for access into the Precinct.

The PPC request provides an indicative earthworks design that delivers flat development sites suitable for light industrial activity while ensuring positive interfaces with the adjoining road and indicative public open space networks and contribution to active mode outcomes through the Precinct. This forms one of the key design principles articulated within the Urban Design Assessment, which seeks to minimise the extent of retaining required along the public realm interface through the utilisation of batters and low level retaining to achieve level building platforms and compliant road gradients. These outcomes are important as they can influence the amenity, function and ultimately the success of the active modes infrastructure through the Precinct and linkages to the wider area. Policy IX.3(8) and Criterion IX.8.2(1)(a) and Precinct Plan 1 set the expectations regarding the location of the collector road network through the Precinct. Criterion IX.8.2(1)(h) sets the expectations regarding the design of retaining walls which share an interface with the public realm.

#### *Road hierarchy, green corridors and contribution to active modes*

Further to the discussion above relating to block structure, the PPC request seeks to ensure the adequacy, functionality and amenity of pedestrian and cycle infrastructure through the Plan Change area, as these will contribute heavily to the success and use of that infrastructure. Specifically, Standard IX.6.9 (Road Design) and Appendix 1: Road Function and Design Elements Table set out the design / cross-sectional requirements, including functional / operational requirements as well as planting, for the hierarchy of collector and local roads anticipated within the Precinct.

The PPC request has also identified the opportunities for a connected and co-located green network that includes a legible and safe pedestrian and cycle network as well as stormwater management devices, wetlands and streams. The Development Concept Plan sets out the green network around the permanent and intermittent streams, with John Creek forming the primary north – south spine through the Plan Change area. Potential key pedestrian / cycle connections from the northern end of that corridor out onto Dairy Flat Highway have been identified. Proposed Objective IX.2(9) and Standard IX.6.2(1) work in conjunction with the indicative open space zone areas to achieve those outcomes.

#### *Additional height areas*

The applicants note that light industrial development frequently can exceed the 20m height limit of the zone, with warehousing (and other activities) often requiring greater heights. It is a more efficient use of land to enable additional height, and accordingly, the applicants have sought to provide that opportunity in appropriate locations (i.e. where landscape visual outcomes can be maintained).

Height was not specifically assessed as part the background landscape analysis that informed the Structure Plan. A Height Variation memorandum (**Height memo** - included at **Appendix 18** to this report) has been prepared by Boffa Miskell to inform the PPC request. The analysis contained within the Height memo confirms that a height of up to

30m can be permitted within the centre and lower lying portions of the site. The rationale for this conclusion is:

- Greater height is located in the centre of the Plan Change area, away from existing and future residential areas, and will be sleeved by development areas with a 20m height limit
- The location of the additional height responds to the topography of the Plan Change area
- The landscape buffers proposed for the eastern and western edges of the Plan Change area provide for effective screening and reduce the visual impact of the industrial zone when viewed from SH1 and the surrounding road network as well as from existing residences
- Variation in height will provide for visual interest when viewed from State Highway 1, the surrounding road network and more distant and elevated properties
- The visual and physical links to the surrounding area are protected.

The PPC request includes a bespoke standard (Standard IX.6.1 – Building height) to enable the 30m height areas within the Plan Change area. The precise locations where this additional height entitlement is enabled is set out at IX.10.2 – Silverdale West Industrial Precinct: Precinct Plan 2. This outcome is enabled through Objective IX.2(8), Policy IX.3(14), and Standard IX6.1.

#### *Landscape and visual amenity*

A Landscape Effects and Design Advice memorandum (**Landscape memo**) (refer **Appendix 16**) has been prepared by Boffa Miskell. The Landscape memo reviews the landscape buffers suggested along the SH1 and Dairy Flat Highway frontages in the Structure Plan and recommends an approach appropriate for the PPC.

The Landscape memo summarises landscape background to the Structure Plan as detailed within the report prepared by Bridget Gilbert Landscape Architecture, identifying the following critical matters to be addressed from a landscape perspective. The following matters relate to development of PPC area:

- The interface with SH1
- The relationship with land uses outside the structure plan area
- The need to visually ‘break up’ the appearance of the development, particularly when viewed from an elevated perspective

A number of landscape interventions were identified within the structure plan to address these issues and other issues, such as the provision of an “attractive gateway to Silverdale and the Hibiscus Coast”, including:

- Riparian margins (minimum 20m buffer) to all streams
- Landscape buffers along stream networks
- A 40m Landscape Framework Buffer along the SH1 interface
- A 10m landscape buffer along the Dairy Flat Highway interface
- A connected stream network with cycle and walkways
- Gateway entrance points,
- Kanuka forest; and
- The identification of viewshafts from SH1 (travelling north) across the Plan Change area towards Lloyd Hill and its environs (Auckland Council has subsequently confirmed that the viewshaft sits to the south of the Plan Change area and is not an outcome sought by Council through the PPC).

The Structure Plan acknowledges that the 40m SH1 buffer was introduced to achieve the specific outcome of ‘Creating an attractive gateway from SH1 / Silverdale Interchange’. It also identifies that there are situations where the landform and existing planting obscure views of the area from the motorway and that it is possible to amend the 40m landscape buffer along that interface where existing, unmodified landform features will be retained, existing vegetation protected on private land, or consented landscape planting provides an effective visual screen that provides the same mitigation of potential adverse visual effects.

The Boffa Miskell analysis and design recommendations are not repeated here, although the conclusion to that assessment is set out in full below:

*In relation to the eastern landscape framework buffer along SH1, planting is considered an effective screen to the proposed industrial area in views from the SH1 and the proposed 10m – 15m (plus existing vegetation) is sufficient to achieve an effective screen. A 40m buffer (as per the structure plan), whilst achieving a denser stand of planting is not necessary for the full extent of the corridor.*

*A 5m continuous landscape buffer is recommended for the Dairy Flat Highway. This should be planted to achieve an attractive ‘gateway’ to the Hibiscus Highway. A 10m buffer (as per the structure plan) is not necessary for the full extent in order to achieve an effective gateway.*

*The above recommendations should be included into the landscape masterplan and considered carefully through the detailed design stages of the project. Based on the above recommendations, the proposed buffers will achieve the recommended outcomes of the structure plan in that:*

- *Establishment of a continuous landscape buffer (10m – 15m) along the SH1 corridor interface to provide:
  - *Appropriate visual screening / mitigation from the SH1 road corridor and assist with the breaking up the bulk and massing of buildings when viewed from the residential properties to the east of the site (taking into consideration planting and riparian corridors within the wider industrial area and elevation of these properties)*
  - *Reinforcement of the SH1 corridor as an attractive ‘gateway’ and entrance to the Hibiscus Coast; and*
  - *Establishment of a 5m width landscape buffer along Dairy Flat Highway to provide for an attractive gateway to the Hibiscus Highway.**

On the basis of the above, the PPC includes:

- A continuous landscape buffer of varying depth (between 10m and 15m, except relating to the property at 1738 Dairy Flat Highway for which a 5m buffer is recommended) along the eastern site boundary, contributing to the formation of a ‘gateway experience’ that announces the arrival to Hibiscus Coast through landscaping components adjoining SH1 (refer Policy IX.3(13), Standard IX.6.3, and Special information requirement IX.9(4)).
- A continuous planting buffer with a minimum depth of 5m along the western site boundary Highway contributing to the formation of a ‘gateway experience’ that announces the arrival to Hibiscus Coast through landscaping components adjoining the Dairy Flat Highway interface (Policy IX.3(13), Standard IX.6.3, and Special information requirement IX.9(4)). As context for these requirements, the confirmation that O Mahurangi Penlink is now proceeding reduces the emphasis on the Silverdale interchange as the gateway to Whangaparāoa, with the new connection anticipated to adopt a significant role in that regard.

### *Conclusion*

Overall, having regard to the analysis and conclusions of the Landscape memo and Height memo, the potential adverse effects associated with urban form and landscape outcomes are considered to be managed to an appropriate level by the PPC.



## 10.2 ECONOMIC EFFECTS

An Economic Assessment to inform the PPC request has been undertaken by Property Economics and this is enclosed as **Appendix 7** and sets out a high-level economic analysis of the economic merits of the PPC request to accommodate the expected future industrial land use within the existing economic catchment, and whether the site provides a competitive location for such activity. These matters have been informed by an assessment of the supply and capacity of existing light and heavy industry zoned land within Auckland’s north shore.

The analysis contained within the Economic Assessment is relied upon and not repeated here, however the table below is highlighted as it identifies a critical shortage of industrial zoned land in the area:

AUPOIP	Land Area (ha)	Vacant Land (ha)	Net Developable Land (ha)
Heavy Industry	29	0	0
Light Industry	587	54	39
<b>Total Industrial Zones</b>	<b>616</b>	<b>54</b>	<b>39</b>

**Figure 12– Core catchment area industrial land supply and capacity**

Source: Table 1, Economic Assessment, prepared by Property Economics

Property Economics concludes that:

*“The proposed PPC is considered to provide significantly more economic benefits than economic costs to North Shore’s economy and the local market, providing greater certainty to the future growth of the local industrial economy. Some of the economic benefits associated with the PPC include:*

- *Provision of industrial land to satisfy demand for industrial land over the short-medium. The PPC represents a first step in the long-term industrial land requirements for the northern Auckland market, but a lot more will be required.*
- *Enablement of economies of scale and industrial agglomeration effects to be generated.*
- *Increased industrial employment opportunities and economic profile for the high growth Hibiscus Coast market*
- *Improve certainty for the location of industrial activity*
- *Reduction in marginal cost of infrastructure provision*
- *Potential for mitigation of industrial land prices*
- *Increased flexibility for industrial growth and new entrants*

- *Improved industrial employment opportunities locally and increased industrial employment retention.*

*On balance, having considered all the economic matters related to the proposed PPC, Property Economics considers that the proposed PPC has the potential to generate significant economic benefits that would outweigh any economic costs. As such, Property Economics supports the proposed PPC from an economic perspective in the context of the RMA.*

Overall, the assessment concludes that the potential economic benefits of the Silverdale West PPC outweigh the potential economic costs by a considerable margin.

### 10.3 TRANSPORT

Stantec has prepared an Integrated Transport Assessment (ITA) to guide the development of the PPC. The ITA assesses the transportation implications of the proposed rezoning to Light Industry Zone, and includes the identification of potential measures to avoid, remedy or mitigate adverse transportation effects.

The assessment within the ITA is relied upon, is not repeated here, and has been used to inform the proposed Precinct provisions. A high-level summary of the ITA, its assumptions and findings, is set out below:

- Concurrent with this PPC request, Fulton Hogan Land Development is progressing a separate private Plan Change request for residential development adjacent to Milldale (referred to as Milldale North). Traffic modelling has accounted for the staged delivery of that development concurrent with the staged build out of the Plan Change area for industrial land use.
- For modelling purposes, two future year scenarios were adopted, being 2028 and 2038, the latter being the anticipated time for full build out of the Plan Change area for light industrial activities
- Other land uses accounted for in the model include:
  - Highgate Business Park
  - Milldale Precinct (anticipated to be complete by 2030)
  - Jack Hawken Lane development
  - Orewa 2 Precinct; and
  - Ara Hills development
- Wider road network improvements that are assumed to be complete by 2028 include:
  - An overbridge connecting John Fair Drive with Highgate-Parkway
  - Argent Land arterial route between Dairy Flat Highway and Wainui Road
  - Pine Valley Road upgrade from Argent Lane to Dairy Flat Highway
  - A roundabout at the Argent Lane / Wainui Road intersection
  - SH1 widening (SH18 to Oteha Valley Road)
  - Bus shoulder lanes on SH1 between Silverdale and Oteha Valley Road

- O Mahurangi – Penlink project (including a new motorway interchange at Redvale); and
- The Puhoi to Warkworth improvements (completed).
- Intersection performance by way of ‘Level of Service’ scales is a key performance indicator of the modelling
- Vehicle Kilometres Travelled have been used as another performance indicator

As section 5.3 of the ITA, Stantec identifies the various transport upgrades needed to support the staged development within the Plan Change area through to full build out. The mitigation identified within the ITA is set out below.

*“The modelling indicates that various transport network mitigation upgrades are needed to support the full buildout of the Silverdale West PPC area. These upgrades are set out below:*

1. *Two signalised intersections connecting the PPC area to the external road network via Dairy Flat Highway*
2. *Upgrade of the Pine Valley Road / Dairy Flat Highway intersection to include a second right turn short bay from the east (turning into Pine Valley Road) (approximately 135m) and the inclusion of cycle lanes and footpaths along both sides of Pine Valley Road*
3. *Signalisation of the Wilks Road / Dairy Flat Highway intersection*
4. *Signalisation of the Wilks Road / East Coast Road intersection*
5. *Provision of a slip lane on the western approach to the Silverdale Interchange which connects to the northbound on-ramp*
6. *Extending the length of the left turn slip lane on the southbound off-ramp at the Silverdale interchange to around 150m and introducing a ramp meter for the AM peak*
7. *Provision of a second signalised intersection of Dairy Flat Highway to service the PPC area; and*
8. *Upgrading the Argent Lane / Pine Valley Road roundabout with two circulating lanes.*

*“Indicative layouts for the improvements above are listed in Appendix B [to the ITA]. These improvements are included in the analyses for the two future years in the following section. In addition, specific thresholds for the upgrades have been identified and these are provided in Appendix C [to the ITA].”*

The PPC request ensures that development is tied to the implementation of all necessary infrastructure, with the specific thresholds mentioned above having been incorporated into the proposed Silverdale West Precinct provisions at standards IX.6.7 and IX.6.8.

Importantly, while an upgrade is identified, that is not to be interpreted as necessarily needing to be funded or actioned by the proponents of the PPC / landowners. If development occurs prior to the Council providing the necessary infrastructure upgrades, the Applicants have confirmed that they are capable and willing to front those costs up front (refer **Appendix 22**) and will seek to enter into agreement(s) with Council to ensure implementation of all necessary infrastructure and that a portion of those costs is recovered over time where there is a wider public benefit associated with the infrastructure provided.

The PPC request includes provisions to ensure that the subdivision and development of land for industry and related activities is coordinated with transport infrastructure upgrades necessary to manage adverse effects on the local and wider transport network. The precinct manages and mitigates the adverse effects of traffic generation on the transport network and achieves the integration of land use and transport by:

- (a) Requiring particular transport infrastructure upgrades to be operational by the time a certain level of subdivision and development is reached within Silverdale West (see standard IX.6.7), recognising other future planned development nearby also contributes to travel demand and that the wider area functions as an integrated and effective transport network
- (b) Requiring particular transport infrastructure upgrades to be operational by the time a certain level of subdivision and development is reached within Silverdale West (see standard IX.6.8), recognising that particular upgrades are required to support differing levels of development of the Silverdale West Precinct
- (c) Requiring a comprehensive assessment and an accompanying Transport Assessment addendum report which builds on the Silverdale West Integrated Transport Assessment (Silverdale West ITA) to be prepared for development and subdivision that does not comply with standards IX.6.7 or IX.6.8 (i.e. a level of development that precedes the required upgrades)
- (d) Requiring new collector roads and key local roads within the precinct to be located generally in accordance with Precinct Plan 1, and other new local roads to form a high quality and integrated network; and
- (e) Requiring all proposed roads to be designed in accordance with IX.11.1: Appendix 1 (Road function and design elements table) and IX.11.2 Road function and design elements table – External roads to the precinct.

#### *Widening of Dairy Flat Highway*

Stantec advises that the future road width for Dairy Flat Highway is anticipated to be 30m for most of the PPC frontage, allowing future widening of the road by Auckland Transport to provide up to four traffic lanes plus a median separator or right turn bays and separated cycle lanes and footpaths / berms on both side of the road. The future widening, to be

undertaken by others, is provided for through the PPC request via standard IX.6.6 (Road widening setback along Dairy Flat Highway), which requires all buildings to be located a setback of 3m from the existing legal road boundary.

#### *Walking and cycling*

Dedicated footpaths are proposed alongside all of the roads within the Plan Change area. Additionally, separate walking and cycling paths are proposed along the green corridor through the central spine of the land, with connections to the Dairy Flat Highway / Pine Valley Road signalised intersection to the north.

Indicative road typologies are set out at section 3.2.4 of the ITA, with cross-sections detailing separated cycle lanes on both sides of collector roads to be delivered through the Precinct. These typologies are embedded within the PPC request, with the combination of standard IX.6.8 (Road design) and Appendix 1: Road Function and Design Elements Table.

#### *Public transport*

Stantec has advised that public transport connectivity to the Hibiscus Coast Bus Station will be discussed with the Auckland Transport Metro team at a later date. Nevertheless, all collector roads within the Plan Change area will be designed to cater for buses. Once more detailed information regarding the future Rapid Transit Network route is available, connectivity between the site and the Rapid Transit Network stations can be enabled.

#### *Conclusion*

On the basis of the assessment within the ITA, and the development thresholds and upgrade triggers set out in the PPC request, it is considered that the PPC request mitigates potential adverse effects on the local and wider transport network associated with the progressive development of the Plan Change area to an appropriate level.

## 10.4 ECOLOGY

RMA Ecology has prepared an Ecological Values Assessment (**EVA**) (**Appendix 8**) to inform the preparation of the PPC request. The EVA included surveys of the terrestrial and freshwater areas of the site which were supported by desktop assessments.

For a complete understanding of the ecological advice that has informed the PPC request, please refer to the EVA in full. The following provides a high-level summary of the ecological values of features identified within the Plan Change area:

- An extensive drainage network exists through the Plan Change area, comprising four permanent streams including John Creek being the main watercourse through the Plan Change area, three intermittent streams, and many ephemeral flow paths and farm drains

- Fifteen (15) wetlands meeting the NPSFW definition of ‘natural inland wetland’. Most of these are within the flood plain of John Creek, or have been induced in small catchments due to farming practices
- All wetlands have been highly degraded, resulting in significant modification to the soils and plant communities
- The wetlands are of low ecological value, and typically consist of common native and exotic rushes and herbs adapted to wet soils and are unlikely to offer core, important or significant habitat for indigenous fauna
- Vegetation communities are almost entirely dominated by pastoral grasslands with patches of low scrub within lower gully systems, mature pine tree and exotic shelterbelts.
- One area of seral kanuka forest (identified within the EVA as IV1) meets the criteria for identification of Significant Ecological Areas in Schedule 3 of the AUP (and Policy B7.2) and is considered to be an area of significant indigenous vegetation.
- While the ecological values for wetlands, watercourses and wildlife reflect a highly modified rural landform that has lost most of its original indigenous values and key ecological features such as streams and wetlands are highly degraded, there is substantial opportunity to improve on this and return biodiversity and ecological function to the site.

Ecological protection and restoration outcomes are embedded within the proposed Silverdale West Precinct provisions which include specific objectives to protect, restore and enhance ecological features within the Plan Change area, and policies that require planting of stream margins, the use of native plants in restoration areas, and the management of stormwater with a view to improving water quality. The proposed Precinct Plan and provisions:

- Identify streams and wetlands as constraints in the analysis of features in the Plan Change area
- Formalise the use of the intermittent streams and low-lying wetland areas to the north and central areas of the site as integral parts of the overall drainage structure for the land, and in doing so will protect and restore these features
- Describe vegetated linkages across the site to provide functional and visual green corridors for wildlife (and amenity spaces for workers commuting to / through the land)
- Stormwater management across the land focuses on improving water quality and managing the way in which stormwater quantity is discharged so that stream and wetland values are improved.

The key ecological elements within the Plan Change area that are protected and earmarked for enhancement through the future development of the land includes:

- A central green corridor running south to north and centred on John Creek. The EVA highlights this as the focal point, providing for connectivity and integration of

ecological services through stormwater management, conveyance and treatment, as well as opportunities for ecological restoration and connectivity to indigenous vegetation patches across the site

- Improvements to the aquatic habitat, function and biodiversity values of John Creek as a natural outcome of the revegetation and enhancement of the margins of the Creek and the restoration of the main wetland clusters at the northern and southern ends of the Plan Change area. The EVA notes that this will improve in-stream habitat, riparian margin revegetation and water quality both within the site, and as a consequence, to the northern receiving environment of John Creek and Weiti Stream and the nearby estuary.
- Where riparian enhancement occurs, the EVA identifies that this delivers opportunities not only for revegetation planting, but also created habitats for lizards, bats and invertebrates.

It is anticipated that a number of the smaller mid and upper slope seepage wetlands across the Plan Change area may be removed to enable the road network and efficient light industrial lot sizes to be established. RMA Ecology advises that all of these wetlands are of very low ecological value, and that where future wetland removals trigger ecological redress, there are substantial opportunities within the Plan Change area where offsetting could be applied. Offsetting at off-site locations is also possible and could be undertaken in accordance with the provisions of the AUP.

Overall, RMA Ecology makes the following comments in regard to the ecological effects of the proposed PPC request provisions:

*“Overall, the Structure Plan / Masterplan and the Precinct Provisions provide for the protection and restoration of riparian margins and the establishment of multi-purpose green corridors which will result in a far greater diversity and coverage of native treeland, linkages, and resources for wildlife than is currently present.*

*“The identification of the features identified in this report will assist in their recognition at the time of future resource consent applications. The NES-FW and the AUP include a comprehensive set of rules relating to identified features (for example E3 for streams and E15 for vegetation). These are considered to be appropriate to address the potential for adverse effects in the same way they already apply to the local area’s more intensive use Zones. From an ecological perspective, these rules are appropriate to address relevant effects that may be generated at the time of resource consent.*

*“Considering the absence or low ecological values within the Plan Change site, it is my opinion that the precinct provisions will adequately protect all of the important ecological values of the site. Where there may be unavoidable adverse effects on ecology values, these can be effectively remedied, mitigated, offset, or compensated such that the overall net ecological effect of the Plan Change will be no more than minor.*

*“The overall outcome from the proposed Private Plan Change will be a clear, positive, net-benefit for indigenous biodiversity values and ecological services, and spans waterways, wetlands, wildlife habitat and native revegetation.”*

In addition to the above, RMA Ecology notes that as part of future resource consent processes, where residual ecological effects exist following avoidance, mitigation and on-site enhancement works, off-site protection and enhancement opportunities will be investigated. This is acknowledged within the PPC provisions (standard IX.6.2(2)).

On the basis of the assessment and conclusions from RMA Ecology, the ecological outcomes embedded within the proposed provisions, and the reliance on the existing provisions of the AUP and the NES-FW to guide future resource consent processes, it is considered that the PPC request appropriately manages potential adverse ecological effects and provides the framework for overall enhancement of ecological values within the Precinct over time.

## 10.5 STORMWATER MANAGEMENT

A Draft **SMP** has been prepared by Civix (refer **Appendix 10**). The SMP aims to align the proposed stormwater management approach for the Plan Change area with the requirements of the AUP, taking into account the catchment specific issues, constraints and opportunities. It is intended that the SMP will be adopted into the region-wide stormwater Network Discharge Consent and provisional approval for the SMP will be sought during the plan change process as evidence that stormwater is able to be managed in line with the requirements of the Stormwater NDC .

The following provides a brief summary of the existing site features relevant to stormwater management across the Plan Change area:

- John Creek flows through the site and is the predominant receiving environment. This ultimately drains to Karepiro Bay via Weiti River
- There are 15 natural inland wetlands as defined by the NPS-FW located within the site. Many of the smaller mid and upper slope seepage wetlands are within proposed infrastructure or critical land use areas and may be removed. As detailed in the EVA, in the event of removal, there are substantial opportunities on the site where offsetting could be applied. Where offsets cannot be located within the Plan Change area, wetland enhancement and re-creation will be located elsewhere in line with Council’s accepted practice.
- Numerous overland flow paths are present across the site and converge at John Creek. Flood plains associated with these flow paths are also present, predominantly in the low-lying northern reaches of the Plan Change area
- The site is not subject to risk of coastal inundation
- The site includes highly modified landform that has lost most of its original indigenous value. While the key ecological features such as streams and natural



inland wetlands are highly degraded, there is substantial opportunity to improve on this and return biodiversity and ecological function to the site.

In preparing the draft SMP, Civix has reviewed the existing planning context to determine the appropriate stormwater and flooding requirements to adopt for Silverdale West. The relevant sections are summarised below:

Requirement	Design response
Unitary Plan – SMAF hydrology mitigation	5mm retention and detention tanks with non-potable water reuse for all buildings Extended Detention Volume for stream protection via artificially constructed wetlands for all paved surfaces
High Contaminant Generating Areas	Treatment for the site to be provided via artificially constructed wetlands prior to discharging into the natural stream.
Natural Hazards	Flood modelling and assessment. Design of the site to ensure safe access and that floor levels are not at risk of flooding.
Auckland Unitary Plan Precinct	(N/A)
Existing Catchment Management Plan	(N/A)
Auckland Council Regionwide Network Discharge Consent	Measures proposed comply with the NDC: <ul style="list-style-type: none"> <li>• Natural hydrology is restored and protected as far as practicable, utilising SMAF-1 requirements.</li> <li>• Discharge of contaminants and temperature related effects are managed using engineered wetlands.</li> <li>• Engineered structures are located outside of stream extents and 1% AEP floodplain.</li> <li>• Water quality treatment is proposed for all impervious surfaces</li> <li>• Flooding is contained within the stream extent, and downstream flooding is not exacerbated by the proposed development.</li> <li>• All assets to be vested as public are to be designed in accordance with relevant guidelines</li> </ul>

Source: Table 3-1 Regulatory and design requirements, prepared by Civix

Key principles relating to the following matters are embedded within the draft SMP and guide the stormwater management approach:

- Ensuring good water quality
- Stream hydrology will be maintained
- Appropriately managing flooding
- Assets designed and constructed to relevant standards
- SMAF 1 provisions will be applied

For completeness, it is noted that the draft SMP relies exclusively on the existing, established Auckland-wide provisions of the AUP. Civix advises that no site-specific standards are needed within the PPC request to achieve the intended performance and outcomes. It is noted however that development within the proposed Silverdale West Precinct Stage 1 and Stage 2 areas will necessitate engineering intervention to ensure up and downstream flooding is not increased as a result of the increase in impervious surface within each of those Stages. The stormwater management approach is set out at section 6.2 of the draft SMP. The table below summarises the principles of the proposed stormwater management approach:

<b>Silverdale West Stormwater management approach</b>	
Water quality	<ul style="list-style-type: none"> <li>▪ Implementation of AUP Chapter E9 – High contaminant generating car parks. Contaminants of concern for car parks are generally high levels of total suspended solids and dissolved metals such as zinc and copper.</li> <li>▪ GD01 equivalent treatment should be provided, and depending on the final design, may take the form of proprietary treatment devices such as Storm Filters or GD01 devices</li> <li>▪ Communal wetlands are proposed to treat all the impervious areas including roadways prior to slowly discharging the runoff into the natural stream.</li> </ul>
Stream hydrology	<ul style="list-style-type: none"> <li>▪ There shall be no direct discharge to the stream. All runoff from the development will be conveyed to the proposed communal wetlands where the treatment and detention are provided to mimic up to the 10-year pre-development flow into the stream.</li> <li>▪ Implementation of SMAF 1 hydrology mitigation, including:               <ul style="list-style-type: none"> <li>- Reuse of the equivalent of 5mm of roof runoff into the proposed buildings for non-potable use</li> <li>- Detention (temporary storage) with a drain down period of 24hrs for the difference between pre and post-development runoff volumes from the 95<sup>th</sup> percentile, 24hr rainfall minus the retention volume for all impervious areas</li> <li>- Detention can be provided via tanks, ponds, artificially created wetlands, raingardens or other methods that meet the SMAF requirements.</li> </ul> </li> </ul>
Stream erosion	<ul style="list-style-type: none"> <li>▪ Significant existing erosion of the stream networks exists. To mitigate the effects of the proposed development on these systems, it is recommended that erosive flows for these downstream waterways are quantified via a shear analysis of the stream banks and then detention controls should be implemented into the proposed wetlands as far as practicable to reduce the flow duration of these erosive flows.</li> <li>▪ The following ecological protection and restoration initiatives are expressed:               <ul style="list-style-type: none"> <li>- A central south-north green corridor centred on John Creek which will provide a focal point, connectivity and integration of ecological services through stormwater management, conveyance and treatment</li> <li>- Improve aquatic habitat, function, and biodiversity values of John Creek as a natural outcome of the revegetation and enhancement of the margins of the creek and restoration of the main wetland clusters at either end of the site</li> <li>- Where riparian enhancement is included, this provides opportunities for not only revegetation planting, but also include creating habitat for fauna.</li> </ul> </li> </ul>
Network capacity	<ul style="list-style-type: none"> <li>▪ Network capacity for the development will be designed to have sufficient capacity for the 100-year scenario</li> <li>▪ The drainage reserve for the site has been sized to utilise culverts as hydraulic controls to maintain downstream flows and water levels at pre-development conditions.</li> </ul>
Proposed wetlands	<ul style="list-style-type: none"> <li>▪ The site is divided into 14 distinct sub-catchments, each of which will need a communal device (such as a wetland). These devices</li> </ul>

	<p>serve multiple purposes including hydrology and flood mitigation for all land uses within the sub-catchments.</p> <ul style="list-style-type: none"> <li>▪ Existing natural wetlands are largely preserved, and any modifications to those existing wetlands should follow an appropriate consenting process to ensure effects are appropriately managed.</li> <li>▪ Constructed wetlands will be located adjacent to John Creek and other streams in order to capture the stormwater mains along the roads.</li> <li>▪ Constructed wetlands have been sized at 3% of the impervious area they treat</li> </ul>
Outfalls	<ul style="list-style-type: none"> <li>▪ New outfalls will be required as part of the new wetland system and overall stormwater management for the wider site. To minimise the impact all new outfalls should be designed as ‘green’ outfalls that integrate into the natural landscape around them.</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>▪ Preliminary afflux modelling indicates the development of the Plan Change area will not significantly affect water levels on downstream properties in the 1% AEP storm event with proposed mitigation in the form of the drainage reserve and artificial wetlands.</li> <li>▪ John Creek will need to be throttled at the two indicative stream crossing locations in order to avoid increasing flood water levels downstream. These throttled stream crossing structures will allow water to back up behind the structures to alleviate pressure downstream.</li> <li>▪ All finished floor levels for future buildings shall be set with appropriate freeboard</li> </ul>
Hydraulic connectivity	<ul style="list-style-type: none"> <li>▪ The development areas are connected hydraulically through new public stormwater network which ties into outfalls leading to new wetlands and the streams running through the site</li> </ul>
Asset ownership	<ul style="list-style-type: none"> <li>▪ Drainage assets that drain more than 1 title are proposed as public. Treatment and mitigation systems serving privately owned lots are proposed as private</li> </ul>

Through the combination of reliance on existing provisions within the AUP, the adoption of an SMP under Auckland Council’s Global Stormwater Network Discharge Consent, the indicative Open Space zoning which takes in land needed for stormwater management and the PPC provisions requiring enhancement of riparian margins and consistency with an adopted SMP, it is considered that any associated adverse stormwater effects are being managed to an appropriate level.

## 10.6 NATURAL HAZARDS / FLOODING

Civix has prepared a Flooding Effects assessment as part of the SMP which is relied upon here. It confirms that a flood plain traverses the Plan Change area. John Creek, which is a permanent stream running south to north through the Plan Change area and has an average width of 4m, forms the primary basis of stormwater flows through the land. Esplanade Reserve requirements will be triggered by future subdivision.

All indicative development sites have been set back at least 20m from the stream edge (where it has an average width of 3m or more), with many of the lots extending more than 30m, and some more than 50m away from the stream edge in order to provide room for the existing natural wetlands to the east, new artificially constructed wetlands to the west, and formation of gently earthworks batters and landscaping / green links along the length of John Creek.

The topography, the scale of the riparian areas and indicative location of future development lots affords high capacity to manage flood hazards within the Plan Change area. As summarised at section 5 of their Infrastructure Report (refer **Appendix 11**), Civix advises that on the basis of afflux analysis, the development of the land in accordance with the PPC request will not affect water levels on downstream properties during the 1% AEP storm event, with the drainage reserve and artificially constructed wetlands and the throttling of flood water flows at the two indicative John Creek crossing locations performing effectively. This is contingent on the implementation of culverts at the two proposed John Creek stream crossings to assist with holding back stormwater flows, and otherwise ensuring flood storage within each Stage is appropriately provided for. An alternate but equally effective stormwater management approach could be adopted.

## 10.7 SERVICING – WATER SUPPLY AND WASTEWATER

### 10.7.1 Water Supply

Civix has undertaken an assessment of water supply servicing requirements for the Plan Change area at section 7 of the Infrastructure Report. There is currently no reticulated water supply to the site.

Existing trunk water supply to the Hibiscus Coast area is via the Orewa 1 and 2 watermains which are both located along East Coast Road from the Glenvar Reservoir on the North Shore. Improvements are currently being undertaken on the trunk mains to provide for growth in the Wainui area.

Civix advises that the following upgrades are required to ensure water supply to the Plan Change area:

- A new booster pump station located on the Orewa 2 watermain (under construction)
- A new connection from the Orewa 2 watermain across to the Silverdale West Industrial Area, and construction of part of the Orewa 3 trunk watermain within the Structure Plan area

Further upgrades will be required for the long-term development of the wider area, being:

- A new Orewa 3 trunk watermain from Albany or Schnapper Rock reservoirs (or both) which will pass through the Silverdale West Industrial Area on its way north

to Orewa and the Whangaparāoa Peninsula. This will pass through but is not intended to service the Plan Change area.

- New reservoir storage to supplement future localised growth and trunk operation
- Abandonment of the existing Orewa 1 watermain.

Civix advises that the internal site will be serviced by a combination of 150mmØ and 200mmØ watermains, with all necessary fittings, fire hydrants and valves. An additional length of watermain has been allowed for along the Dairy Flat Highway. No water pressure issues are anticipated, although this will be confirmed as part of future developments.

Early engagement with Watercare provided information around a 300mmØ watermain proposed to be extended through to service the Structure Plan area along with a 750mmØ transmission watermain.

### 10.7.2 Wastewater

Civix discuss wastewater servicing requirements for the Plan Change area at section 6 of their Infrastructure Report. No existing wastewater connection to the site exists.

A new local wastewater pump station located at the lowest point in the catchment is anticipated to ultimately discharge to the existing gravity manhole at the intersection of Argent Lane and Maryvale Road, which will ultimately discharge at the Army Bay WWTP for treatment.

Civix advise that wastewater from development to the east of SH1 will also be discharged to the same manhole. They note that utilising the existing 560mm Ø pipe over Weiti Bridge is not initially feasible given the low flows from the early development. Water Acumen has identified and discussed two interim options (as detailed at Attachment G to the Infrastructure Report), however these have only been developed to concept design level to demonstrate that there are feasible options to resolve this issue.

A gravity system design in accordance with Watercare's design standards as set out in the Code of Practice is anticipated to be implemented across the Plan Change area to serve the development. These will be directed to the Wastewater pump station and kept out of the 1% AEP floodplain to avoid surcharge of the collection systems.

While the Army Bay WWTP upgrades will provide sufficient capacity for the catchment from 2031, there is the potential need for an interim wastewater solution to support earlier development across the Plan Change area prior to the upgrades being operational. The Proposed Plan Change sets up a process whereby resource consent for a Non-complying Activity will need to be obtained for an alternative servicing approach where there is not sufficient capacity within the public network.

On the basis of the advice from Civix and Water Acumen, it is clear that feasible options are available to ensure appropriate wastewater service to the Plan Change area.

## 10.8 CONTAMINATION

A Preliminary Site Investigation (PI) has been prepared by Groundwater and Environmental Services (refer **Appendix 13**). That report confirms some localised low-level contamination issues consistent with historical farming land use that are able to be addressed via consenting processes at the time of any future subdivision or earthworks, and concludes:

*“None of the identified environmental issues would provide a barrier to the proposed Plan Change. The issues would be able to be dealt with at the subdivision or earthworks consent stages following the process set out in the NES and the contaminated land provisions of the Auckland Unitary Plan.*

On the basis of the findings of the PSI, the PPC request seeks to rely on the existing NES and AUP processes for managing potentially contaminated land. Those provisions are the most appropriate, and no specific contamination related provisions are considered necessary in this instance.

## 10.9 GEOTECHNICAL HAZARDS

A Geotechnical Report has been prepared by CMW Geosciences to inform the PPC request and this is included as **Appendix 12**. That report concludes that the land is suitable for creating stable building platforms and infrastructure, having acceptable levels of post-development residual risk from natural hazards.

The Geotechnical Report does identify geotechnical hazards associated with the soft alluvial soils in the lower areas of the Plan Change area, and instability issues within the higher land adjoining Dairy Flat Highway. These issues can be addressed as part of future development processes and do not directly impact the form of the PPC request. For completeness, the advice from CMW Geosciences has been considered as part of the work by Civix in preparing indicative cut and fill plans which detail how industrial land use, roads and stormwater management may be accommodated within the Plan Change area.

## 10.10 CULTURAL VALUES

The Applicant has sought early engagement with Mana Whenua in the development of the PPC. Thirteen iwi entities (as detailed in **Appendix 19**) were invited to attend a specific hui on the Silverdale West PPC on Friday 16 December 2022. Only Ngāti Maru accepted the invitation and attended the session.

General questions were raised in respect to Johns Creek, riparian margins and the viewshaft from SH1 to Lloyd Hill and its hinterland. Ngāti Maru confirmed their position that they did not see a need to provide a Cultural Values Assessment (CVA), and instead agreed an approach whereby draft reports would be shared for review and comment followed by hui to discuss any queries. Engagement with Ngāti Maru is ongoing.

A significant amount of iwi engagement was undertaken by Auckland Council in the development of the Silverdale West Structure Plan. Those values are discussed at Sections 4.9 and 6.11 of the Structure Plan. It was informed by contributions from Mana Whenua, Iwi Management Plans, and a CVA prepared on behalf of Ngāti Manuhiri. Cultural values were discussed under the headings of ‘land’, ‘water’, ‘biodiversity (vegetation, terrestrial fauna, aquatic environment and fauna)’, ‘wāhi tapu (sacred place or site) and taonga (treasure)’ and ‘social, economic and cultural wellbeing’.

The Structure Plan took on board that feedback as part of the creation of the Structure Plan, which the PPC request is largely consistent with. The proposed provisions seek to provide certainty around water quality and ecological enhancement within the Precinct, particularly along Johns Creek and its tributaries, with these features protected by way of indicative Open Space zoning.

## 10.11 ARCHAEOLOGY AND HERITAGE

### 10.11.1 Archaeology

Clough and Associates have prepared an Archaeological Assessment (refer **Appendix 15**). The Archaeological Assessment confirms the presence of a single recorded archaeological site within the Plan Change area, and two sites are recorded on the Auckland Council Cultural Heritage Inventory (**CHI**).

The identified archaeological site (R10/737) relates to the homestead, inn, stables and associated buildings of the former owner, Maurice Kelly, located at 1750 Dairy Flat Highway. There are no surviving above-ground remains of the site, however the Archaeological Assessment identified a high potential for subsurface features to be extant and have the potential to be affected by future development. It also notes the potential for surviving features relating to 19<sup>th</sup> century farming in the vicinity of John Creek, including the two ‘CHI’ sites at 1732 and 1744 Dairy Flat Highway. Accordingly, it recommends built heritage review of those sites for potential heritage values, in addition to the former Kelly property (this work has been undertaken by Archifact, as discussed below).

No archaeological remains relating to Māori settlement were found during field survey or through background research.

In light of the advice from Clough and Associates relating to the potential for sub-surface features to be present within the footprint of the former Kelly homestead, Fulton Hogan Land Development sought and obtained a s56 exploratory authority (Authority no. 2023/392) from Heritage New Zealand Pouhere Taonga (**HNZPT**). Clough and Associates undertook physical investigations and prepared a report (Maurice Kelly’s Homestead and Inn (R10/737): s56 Exploratory Investigation) (**s56 Report**) (refer **Appendix 16**) in accordance with the requirements of the Authority. The investigation confirmed the

presence of subsurface archaeology relating to Maurice Kelly's homestead / Inn in good condition, and that it is likely that further features survive in the immediate area.

The s56 Report makes the following recommendations:

- That consideration be given to protecting the subsurface archaeological remains of site R10/737 within the area indicated on Figure 27 where the (probable) house structure closest to the road is located. Installation of interpretive elements such as surface demarcations of the house and an informal panel should be considered
- While any remaining subsurface archaeology relating to R10/737 on the property is likely to have been previously modified / vertically truncated, that a general archaeology authority will still be required from HNZPT prior to commencement of any earthworks that may affect the site
- This approach to mitigation would have the following outcomes:
  - Surviving archaeology in good condition which is representative of the site is avoided and preserved in situ
  - The local community would benefit with interpretive elements providing awareness of the site and the opportunity for knowledge transfer
  - Any surviving archaeological remains relating to the Kelly settlement would be investigated and recorded under authority from HNZPT, which would provide detailed information on this early settler family who played a notable part in the development of the Wade area from the 1860s onwards.
- That HNZPT is contacted to discuss the results of the s56 investigation and the proposed mitigation approach.

The recommendations and mitigation outlined by Clough and Associates will be considered as part of any future development works in proximity to the former Kelly Homestead and Inn.

On the basis of works being undertaken in accordance with the recommendations of the Archaeological Assessment and the s56 Report, any adverse archaeological effects associated with the PPC request are able to be suitably mitigated.

### 10.11.2 Built heritage

Following the advice from Clough and Associates, Archifact was engaged to prepare a Heritage Assessment of specific existing built form items present within the Plan Change area (refer **Appendix 14**), and specifically the properties at 1732 and 1744 Dairy Flat Highway. Consistent with the Auckland Unitary Plan planning maps, the Heritage Assessment confirms that there are no items of heritage value present on the site. They conclude:

*"The heritage assessment finds that the structures and dwellings considered and assessed within this document are of no historic heritage significance within the locality*



*and region. There is nothing we can see from an historic heritage position that would in any way constrain the removal or demolition of these assets.”*

On the basis of the above, it is considered that there are no adverse historic heritage effects.

### 10.11.3 Trees

Arbor Connect have undertaken an assessment of the trees within the Plan Change area to determine if any meet the criteria for inclusion in Schedule 10: Notable Tree Schedule of the Auckland Unitary Plan. The assessment concluded that four trees have qualities that may make them candidates for scheduling. These trees range in score from 20-30 with a score of 20 being the threshold for scheduling.

Tree Number	Species	Address	Total Score
1	Silky Oak	1638 Dairy Flat Highway, Dairy Flat	24
2	Pin Oak	1686 Dairy Flat Highway, Dairy Flat	20
3	Cooks Pine	1700 Dairy Flat Highway, Dairy Flat	30
4	English Oak	1732 Dairy Flat Highway, Dairy Flat	25

The PPC seeks to introduce those four trees as part of Schedule 10: Notable Tree Schedule and the associated overlay mapping layer.

## 10.12 SUMMARY OF EFFECTS

The actual and potential effects of the proposed PPC have been considered above, based on extensive reporting and analysis undertaken by a wide range of technical experts. On the basis of this analysis, it is considered that the area is suitable for urban development and the proposed mix of uses will result in positive effects on the environment in terms of the social and economic well-being of the community as well as providing opportunities for ecological enhancement. Where adverse effects are anticipated, the proposed policies and rules of the PPC, in addition to those in the Auckland-wide and zone provisions, will ensure they are appropriately avoided, remedied or mitigated.

## 11.0 SECTION 32 ANALYSIS

The following section addresses the Section 32 RMA requirements for preparing and publishing an evaluation report that assesses the PPC. The report must:

- a. *Examine the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA;*
- b. *Examine whether the provisions are the most appropriate way to achieve the objectives, by*
  - (i) *Identifying other reasonably practicable options for achieving the objectives;*
  - (ii) *Assessing the efficiency or effectiveness of the provisions in achieving the objectives; and*
  - (iii) *Summarising the reasons for deciding on the provisions.*
- c. *Contain a level of details corresponding to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal;*
- d. *An assessment under (b)(ii) above must identify and assess the costs and benefits of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions from implementing the provisions including opportunities for economic growth and employment. The assessment should also include a quantification of costs/benefits (if appropriate) and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

### 11.1 APPROPRIATENESS OF THE PROPOSAL TO ACHIEVE THE PURPOSE OF THE ACT

Section 32(1)(a) of the RMA requires an evaluation to examine the extent to which the objectives of the proposed PPC are the most appropriate way to achieve the purpose of the RMA.

### 11.2 OBJECTIVES OF THE PLAN CHANGE

The purpose or overarching objective of the PPC is to deliver a well-functioning urban environment through the expansion of the urban area in north Auckland to primarily provide additional land for employment. The PPC will provide for light industrial activities with indicative open space providing for informal recreation along John Creek. The PPC will also achieve a connected multi-modal transport network which integrates with existing networks. In addition, the PPC will retain and enhance key ecological features to

improve ecological outcomes, and respect Mana Whenua values. Overall, the PPC is considered to be complementary to the Silverdale West Structure Plan.

The proposed precinct incorporates objectives to guide development within the Plan Change area to achieve the following outcomes:

- The urbanisation of Silverdale West will result in employment and economic development opportunities reducing the need for some people to travel outside the wider Silverdale / Dairy Flat / Hibiscus Coast areas, area for work.
- The urbanisation of Silverdale West is undertaken in a manner that respects Mana Whenua values, particularly those relating to water quality, biodiversity and ecology.
- Access to and from the precinct occurs in a safe and effective manner.
- Development is coordinated with the provision of infrastructure and transport upgrades.
- Adverse effects on receiving waterbodies are minimised or mitigated;
- The protection, restoration, enhancement and maintenance of ecological habitats within the Plan Change area including riparian margins is achieved;
- Enabling buildings of greater height within lower lying areas; and
- Convenience retail and food and beverage facilities is capped at an overall scale that supports the over-arching transport initiatives of the precinct.

The proposed precinct objectives enable a comprehensive and integrated urban development outcome whilst also achieving positive environmental outcomes. The requirement for growth and transport / infrastructure upgrades to be developed together will also ensure development progresses in a coordinated manner.

### **11.2.1 Assessment of the Objectives against Part 2**

In accordance with Section 32(1)(a), Table 1 below provides an evaluation of the objectives of the PPC.

Table 1: Assessment of Objectives against Part 2 of the RMA

Objectives	RMA S5 Purpose	RMA S6 Matters of national importance	RMA S7 Other matters	RMA S8 Treaty of Waitangi
<b>Theme 1: Well-functioning Urban Environment</b>				
(1) Light industrial activities within Silverdale West Industrial Precinct enable employment and economic development opportunities within the wider Silverdale / Dairy Flat / Hibiscus Coast areas, reducing the need for some people to travel outside the area for work.	These objectives seek to enable future communities of the Silverdale/Dairy Flat/Hibiscus Coast area to meet their social, economic, and cultural well-being by: providing opportunity for local employment within an area of significant residential growth and which can be accessed via public and active modes of transport.	This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The PPC and the AUP contain a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.	This objective does not compromise the recognition of, or the provision of other matters.	These objectives will not offend against the principles of the Treaty of Waitangi.
(10) Convenience retail for small to medium-scale tenancies are enabled within the precinct at a scale that supports over-arching transport initiatives around the limitation of trips generated for daily conveniences, whilst not acting as a generator of trips into the precinct.				
<b>Theme 2: Coordinating the development of land with infrastructure in Silverdale West</b>				
(3) Access to and from the precinct occurs in a safe and effective manner that: a) mitigates the significant adverse effects of traffic generation on the surrounding road network. b) encourages in a mode shift to public and active modes of transport; and c) Ensures public transport can operate efficiently at all times;	The alignment of infrastructure and land use planning will ensure development occurs in a sustainable manner through ensuring that there is adequate infrastructure to service staged growth and mitigate the adverse effects of development on the receiving environment.	This objective does not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives that manages any potential conflict between matters of national importance and infrastructure.	These objectives do not compromise the recognition of, or the provision of other matters. In particular the alignment of infrastructure and land use planning will ensure development makes efficient use of land where there are infrastructure solutions available.	This objective will not offend against the principles of the Treaty of Waitangi.
(4) Subdivision and development are coordinated with the supply of sufficient transport, water, wastewater, energy and communications infrastructure.				
<b>Theme 3: Achieving integrated and quality development</b>				
(7) Enable buildings of greater height within lower lying areas of the precinct to enable a range of industrial activities.	The emphasis of the proposed objectives on achieving a public transport focused and connected development with a high-quality public realm which integrates with landform and natural features will enable future communities of Silverdale to meet their social, economic, and cultural well-being.	This objective does not compromise the recognition of, or the provision of these matters of national importance. The AUP contains existing objectives that manage matters of national importance.	The objectives have regard to the maintenance and enhancement of amenity values and the quality of the environment through ensuring: • The maintenance and enhancement of amenity values through seeking to achieve an integrated and connected development which responds to natural site features and built form. • The maintenance and enhancement of the quality of the environment through ensuring that development manages the interface with surrounding land use and maintains key long distance views across the precinct.	These objectives are consistent with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
(8) The precinct is comprehensively developed industrial environment that responds to natural site features and landform, manages the interface with surrounding land use, supports public and active transport use and respects Mana Whenua values.				

<b>Theme 4: Natural Environment</b>				
(5) Subdivision and development are managed to ensure the maintenance and enhancement of ecological values within the receiving environment.	The emphasis of the proposed objectives on the protection and enhancement of natural and ecological features as well as the adverse effects on receiving water bodies will ensure that the natural resources within the Plan Change area are sustained for future generations.	The objectives recognise and provide for the preservation of the natural character of wetlands and rivers and their margins through ensuring the maintenance and enhancement of the ecological values within stream and wetland habitats. Specifically, the objectives will protect John Creek from inappropriate subdivision and development and will maintain and enhance public access to and along it.	The objectives have regard to the intrinsic value of ecosystems and the maintenance and enhancement of the quality of the environment through ensuring the maintenance and enhancement of the ecological values within stream, and wetland habitats. Additionally, the objectives have particular regard to the effects of the quality of receiving waters through ensuring that stormwater quality is managed to avoid, minimise or mitigate effects.	These objectives are consistent with the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
(6) Strong ecological outcomes are embedded within the precinct through the protection and enhancement of key streams and natural wetlands and areas of indigenous vegetation.				
(9) Development and subdivision demonstrate the integration of green networks focused on freshwater systems with open space and active mode networks through the precinct				

## 11.3 APPROPRIATENESS OF THE PROVISIONS TO ACHIEVE THE OBJECTIVES

### 11.3.1 The Objectives

Section 32(1)(b) of the RMA requires an evaluation to examine whether the provisions (i.e. policies and methods) of the proposed PPC are the most appropriate way to achieve its objectives by:

- Identifying other reasonably practicable options for achieving the objectives;
- Assessing the efficiency and effectiveness of the objectives;
- Summarising the reasons for deciding on the provisions.

As the proposed PPC is amending the AUP (District Plan), the above assessment must relate to the provisions and objectives of the proposed PPC, and the objectives of the AUP to the extent that they are relevant to the proposed PPC and would remain if the PPC were to take effect<sup>3</sup>.

In addition to the objectives of the PPC which are outlined above, the AUP objectives with particular relevance to this PPC are summarised below:

Within the RPS:

- A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future (B2.2.1(1A));
- A well-functioning urban environment with a quality compact urban form that enables a higher quality urban environment, better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects (B2.2.1(1));
- Ensure there is sufficient development capacity to accommodate growth and require the integration of land use planning with the infrastructure to service growth (B2.2.1(3) and B2.2.1(5));
- Urbanisation is contained within the Rural Urban Boundary, towns and rural and coastal towns and villages (B2.2.1(4));
- A well-functioning urban environment with a quality-built environment where subdivision, use and development respond to the intrinsic qualities and physical characteristics of the area, reinforce the hierarchy of centres and corridors, contribute to a diverse mix of choice and maximise resource and infrastructure efficiency B2.3.1(1));

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<sup>3</sup> RMA s32(3)

- Ensure employment and commercial and industrial opportunities meet current and future demands (B2.5.1(1));
- Ensure recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities which contribute to a well-functioning urban environment and that public access to streams is maintained and enhanced (B2.7.1(1) and B2.7.1(2));
- Ensure the mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall (B6.3.1(2));
- Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring (B7.2.1(2));
- Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced (B7.3.2(5)); and
- Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring (B7.2.1(1)).

Within the Business Zones -

- Ensure business activity is distributed in locations, that is accessible and is of a form and scale that provides for the community's social and economic needs (H12.2(4) and (H11.2(4)));
- Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the public transport network; and
- Light industrial activities locate and function efficiently within the Light Industry zone.

Within the Open Space Zones (note: identified for context only, as this would only apply following any subsequent Council plan change to rezone public land to Open Space):

- Recreational needs are met through the provision of a range of quality open space areas that provide for both passive and active activities.

Within the Auckland-wide Provisions:

- Auckland- wide objectives relating to lakes, rivers, streams and wetland, water quality, stormwater, land disturbance and vegetation management and biodiversity seek to avoid adverse effects where possible but recognise the need to use land identified for future urban land uses efficiently;
- Auckland-wide objectives relating to subdivision seek to ensure that subdivision has a layout which is safe, efficient, convenient and accessible and that Infrastructure

supporting subdivision and development is planned and provided for in an integrated and comprehensive manner; and

- Auckland-wide objectives relating to transport seek to ensure that an integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.

The objectives and provisions of the PPC and the relevant objectives of the AUP can be categorised into the following themes:

- Theme 1: Extent of Development in Silverdale West and Land Use Activities
  - Issue 1.1: Extent of Urbanisation of Silverdale West
  - Issue 1.2: Land use Activities
- Theme 2: Coordinating the development of land with transport infrastructure in Silverdale West
- Theme 3: Achieving integrated and quality development
- Theme 4: Natural Environment

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA on the basis of the themes listed above.

## 11.4 OTHER REASONABLY PRACTICABLE OPTIONS FOR ACHIEVING THE OBJECTIVES

### 11.4.1 Theme 1: Extent of Urbanisation of Silverdale West and Land Use Pattern

The AUP objectives which have particular relevance for Theme 1 include:


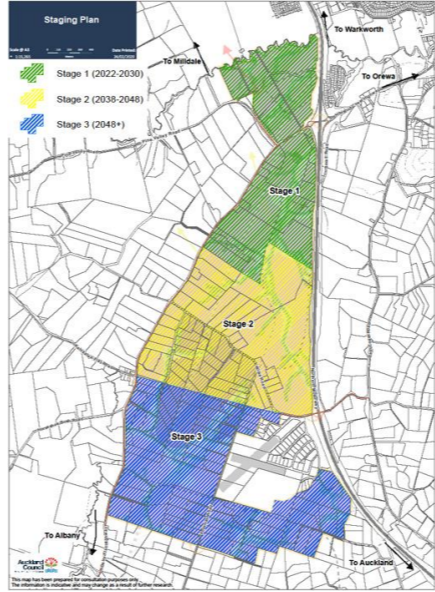
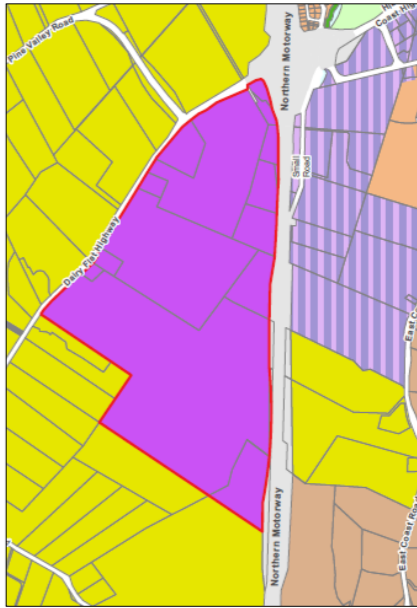
- B2.2.1 (1A) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- B2.2.1 (1) A well-functioning urban environment with a quality compact urban form that enables a higher quality environment, better use of existing infrastructure and efficient provision of new infrastructure, good accessibility for all people including by improved and more efficient public or active transport, reduced adverse effects and improved resilience to the effects of climate change.
- B2.2.1(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.
- B2.2.1(4) Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.
- B2.3.1 (1) A well-functioning urban environment with a quality built environment where subdivision, use and development do all of the following: (a) respond to the



intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) has improved resilience to the effects of climate change.


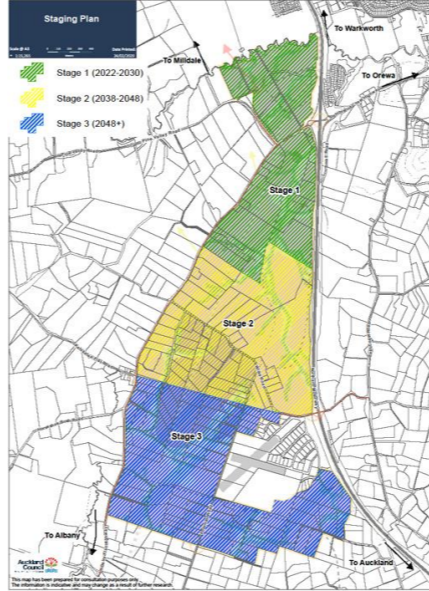
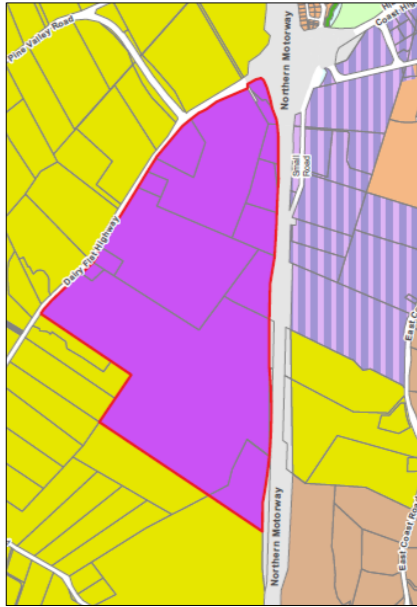
- B2.5.1 (1) Employment and commercial and industrial opportunities meet current and future demands.
- B2.7.1 (1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities which contribute to a well-functioning urban environment.
- H17.2(1) Light industrial activities locate and function efficiently within the zone.

Table 2: Evaluation of Provisions Theme 1.1: Extent of Urbanisation in Silverdale West

	Option 1: Do Nothing	Option 2 – Live zone Stage 1 area identified within Silverdale West Structure Plan	Option 3 – Proposed Plan Change
<b>Description of Options</b>	 <p>This option involves retaining the Future Urban Zone within the Plan Change area and not enabling any further urbanisation at Silverdale West.</p>	 <p>This option involves live zoning the area identified as “Stage 1” within the Silverdale West Structure Plan.</p>	 <p>This option proposes live zoning the Plan Change area in accordance with the PPC.</p>
<b>Benefits</b>			
<b>Environmental</b>	<p>This option will maintain the existing rural character of the Plan Change area.</p> <p>There is no change to the AUP provisions proposed through this option. Existing rules will apply.</p>	<p>Infrastructure solutions are not currently feasible to accommodate this level of development and this could result in adverse environmental effects.</p>	<p>The land subject to the PPC does not contain any scheduled items and is not subject to significant natural hazard risks. Infrastructure solutions are available and therefore there are no significant constraints to urban development of the Plan Change area.</p>
<b>Economic</b>	<p>This option provides the least economic benefit of all the options. The current Future Urban Zoning does not provide for development opportunities or employment use at scale and therefore has little economic benefit.</p>	<p>This option will provide the greatest capacity for light industrial development however, the extent of live zoning has not been sized to meet the availability of infrastructure. Furthermore, this option includes land that is not controlled by the applicants and therefore there is no certainty that it will be developed in the short to medium term. This could lead to lower density development across a larger land area to deliver the same capacity as Option 3 resulting in an inefficient use of land.</p>	<p>Enables the staged development of the Plan change area as infrastructure upgrades are completed, providing additional business capacity from the short term.</p> <p>Provides greater certainty for the Council, community, developers and landowners about the nature, extent and pace of development of Silverdale West.</p>
<b>Social</b>	<p>This option does not facilitate any improved social outcomes.</p>	<p>This option may result in a greater scale of development than Option 3 with potentially more opportunity to provide for amenities to meet the diverse demographic and cultural needs of the future and existing Silverdale community in a coordinated manner.</p>	<p>This option proposes a comprehensive and integrated development over a large land holding. This scale of development will enable social amenities such as open spaces, ecological corridors, and appropriately scaled convenience retail and food and beverage activities to be established. It will enable people to work close to their homes, thereby reducing commuting time and allowing for other productive activities.</p>

<b>Cultural</b>	This option avoids further intensification and development of land with cultural landscape values.	No cultural benefits associated with this option.	No direct cultural benefits associated with this option, although the ecological enhancements offered through the Precinct do adhere to Mana Whenua values.
<b>Costs</b>			
<b>Environmental</b>	This option is less likely to result in the environmental improvements provided for through Option 3, including the protection and restoration of riparian margins.  Environmental impacts associated with ongoing rural use.	This option has not been informed by a Development Concept Plan and supporting technical analysis and therefore does not take into account key features and constraints of the land to the north of the Plan Change area.  Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Silverdale West.	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Silverdale West.
<b>Economic</b>	This option does not make efficient use of land where there are infrastructure and transport solutions to service growth.  Does not add to Auckland's housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment.	This option will result in additional light industrial zoning.  Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a larger live zoned area.	Costs involved in undertaking the development and delivery of infrastructure.
<b>Social</b>	This option does not provide for any additional community facilities or open spaces to meet the diverse demographic and cultural needs of the future and existing Silverdale community.	The scale of development delivered through this option is less likely to achieve the social benefits of more intense development due to the potential for dispersed development.	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community's expectations given the current rural character.
<b>Cultural</b>	There is no change to the cultural environment through this option. However, has the potential to result in rural use which may compromise cultural landscape values.	May result in development of land with cultural landscape values.	May result in development of land with cultural landscape values.
<b>Efficiency &amp; Effectiveness</b>	This option is neither efficient nor consistent with B2.2.1(3) and the requirements of the NPS-UD as no additional business capacity is enabled in the short – mid-term despite analysis being prepared to show that the PPC it is consistent with the RPS, particularly, B2.2.1(1).	This option is not efficient and effective at achieving B2.3.1(1) because analysis has not yet been undertaken to determine an appropriate development pattern to avoid constraints on the land to the north of the Plan Change area. Further analysis is also required to determine the extent of infrastructure that will be required to service this greater land area that can potentially be developed.	This option is efficient and effective at achieving B2.3.1(1) as the potential development has been informed by a detailed concept development plan exercise. Additionally, the effects of built form enabled by the PPC respond to the landform and will maintain key long distance views across the precinct.  This option is efficient and effective at achieving B2.2.2(7) as analysis undertaken as part of this PPC request confirms there are infrastructure solutions available and able to be funded.
<b>Summary</b>	Option 3 is preferred. The urbanisation of Silverdale West within the Plan Change area is consistent within B2.3.1(1) in that urban development has been informed by a detailed concept development plan exercise. Analysis undertaken as part of this PPC request confirms there are infrastructure solutions available and able to be funded.		

Table 3: Evaluation of Provisions Theme 1.2: Land Use activities

	Option 1: Do Nothing	Option 2 – Live zone Stage 1 area identified within Silverdale West Structure Plan	Option 3 – Proposed Plan Change
<b>Description of Options</b>	 <p>This option involves retaining the Future Urban Zone within the Plan Change area and not enabling any further urbanisation at Silverdale West.</p>	 <p>This option involves live zoning the area identified as “Stage 1” within the Silverdale West Structure Plan.</p>	 <p>This option proposes live zoning the Plan Change area in accordance with the PPC.</p>
<b>Benefits</b>			
<b>Environmental</b>	<p>This option will maintain the existing rural character of the Plan Change area.</p> <p>There is no change to the AUP provisions proposed through this option. Existing rules will apply.</p>	<p>Could result in substantially similar outcomes in terms of Light Industry development potential, however may not result in the same nuanced approach to infrastructure provision, stormwater management and ecological outcomes as are provided through the PPC request.</p>	<p>The land subject to the PPC specifically identifies the land around Johns Creek and its tributaries as being within indicative Open Space areas. The form, nature and extent of any actual public open space land will be subject to Council approval via subdivision consent processes later on. Any land that is ultimately vested in Council as reserve will be re-zoned to an Open Space Zone by Council through a regular update plan change process. It forms a key part of the stormwater management approach, with ecological outcomes for the Precinct also strongly linked to that area.</p> <p>While the full extent of the Plan Change area is identified as being within the Light Industry Zone, it is acknowledged that the green corridor is an essential outcome of the staged development of the precinct, and that industrial development will sit outside those areas deemed necessary to support the wider stormwater, ecology and open space amenity areas, and is able to be managed to create efficient and effective industrial development sites that meet the wider built form outcomes identified for the Precinct. If Council</p>



			<p>were open to it, the Applicants would happily re-integrate Open Space zoned land within the PPC.</p> <p>Infrastructure solutions are available to ensure the Plan Change area is able to be serviced while appropriately avoiding or mitigating associated adverse effects on the environment.</p> <p>Accordingly, the proposed land use across the Plan Change area supports and facilitates positive environmental outcomes.</p>
<b>Economic</b>	This option provides the least economic benefit of all the options. The current Future Urban Zoning does not provide for development opportunities or employment use at scale and therefore has little economic benefit.	This option will provide the greatest capacity for light industrial development however, the extent of live zoning has not been sized to meet the availability of infrastructure. Furthermore, this option includes land that is not controlled by the applicants and therefore there is no certainty that it will be developed in the short to medium term. This could lead to lower density development across a larger land area, and a slower up-take of industrial capacity in this location to deliver the same capacity as Option 3 resulting in an inefficient use of land.	<p>Enables the staged development of the Plan change area as infrastructure upgrades are completed, providing additional business capacity from the short term. Nuanced approach to development height has resulted in industrial land use up to 30m in height within those lower lying parts of Silverdale West.</p> <p>Provides greater certainty for the Council, community, developers and landowners about the nature, extent and pace of development of Silverdale West.</p>
<b>Social</b>	This option does not facilitate any improved social outcomes.	This option may result in a greater scale of development than Option 3 with potentially more opportunity to provide for amenities to meet the diverse demographic and cultural needs of the future and existing Silverdale community in a coordinated manner.	This option proposes a comprehensive and integrated development over a large land area. The PPC provides for explicit provision of social amenities such as open spaces and ecological corridors, and appropriately scaled convenience retail and food and beverage services to be established.
<b>Cultural</b>	This option avoids further intensification and development of land with cultural landscape values.	No cultural benefits associated with this option.	No cultural benefits associated with this option.
<b>Costs</b>			
<b>Environmental</b>	<p>This option is less likely to result in the environmental improvements provided for through Option 3, including the protection and restoration of riparian margins.</p> <p>Environmental impacts associated with ongoing rural use.</p>	<p>This option has not been informed by a Development Concept Plan and supporting technical analysis and therefore does not take into account key features and constraints of the land to the north of the Plan Change area.</p> <p>Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Silverdale West.</p>	Potential effects on adjoining properties and surrounding land uses as a result of urban development at a greater height and density than currently provided for within Silverdale West.
<b>Economic</b>	<p>This option does not make efficient use of land where there are infrastructure and transport solutions to service growth.</p> <p>Does not add to Auckland's housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment.</p>	<p>This option will result in additional light industrial zoning.</p> <p>Costs involved in undertaking the development and delivery of transport infrastructure necessary to service a larger live zoned area.</p>	<p>This option results in slightly less light industrial zoned land, but a clearer and more nuanced application of Light Industry and Informal Recreation zoning providing greater certainty about what land is available for development.</p> <p>Costs involved in undertaking the development and delivery of infrastructure.</p>
<b>Social</b>	This option does not provide for any additional community facilities or open spaces to meet the diverse demographic and cultural needs of the future and existing Silverdale community.	The scale of development delivered through this option is less likely to achieve the social benefits of more intense development due to the potential for dispersed development and the more fragmented land holdings within the Stage 1 area.	The scale of development delivered through this option may be considered by some members of the community to be not in keeping with the community's expectations given the current rural Character.
<b>Cultural</b>	There is no change to the cultural environment through this option. However, has the potential to result in rural use which may compromise cultural landscape values.	May result in development of land with cultural landscape values.	May result in development of land with cultural landscape values, although no specific concerns have been raised.

<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS-UD as no additional business capacity is enabled in the short – mid-term despite analysis being prepared to show that the PPC it is consistent with the RPS, particularly, B2.2.1(1).	This option is not efficient and effective at achieving B2.3.1(1) because analysis has not yet been undertaken to determine an appropriate development pattern to avoid constraints on the land to the north of the Plan Change area. Further analysis is also required to determine the extent of infrastructure that will be required to service this greater land area that can potentially be developed, nor how that infrastructure might be delivered.	This option is efficient and effective at achieving B2.3.1(1) as the potential development has been informed by a detailed concept development plan exercise. Additionally, the effects of built form enabled by the PPC respond to the landform and will maintain key long distance views across the precinct while enabling increases in height in appropriate locations.  This option is efficient and effective at achieving B2.2.2(7) as analysis undertaken as part of this PPC request confirms there are infrastructure solutions available and able to be funded.
<b>Summary</b>	Option 3 is preferred. The land use outcomes of Silverdale West within the Plan Change area are consistent within B2.3.1(1) in that urban development has been informed by a detailed concept development plan exercise. Analysis undertaken as part of this PPC request confirms there are infrastructure solutions available and able to be funded, utilising land either within the Plan Change area or public land.		

#### 11.4.2 Theme 2: Coordinating the development of land with infrastructure in Silverdale West

The existing AUP and proposed precinct objectives which have particular relevance for Theme 2 include:

- B2.2.1(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure and improves resilience to the effects of climate change.
- B3.2.1(5) Infrastructure and land use planning are integrated to service growth efficiently.
- B3.3.1(1)(b) Effective, efficient and safe transport that integrates with and supports a quality compact urban form.
- E27.2(1) Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed.
- IX.2(4) Subdivision and development are coordinated with the supply of sufficient transport, water supply, stormwater, wastewater, energy and communications infrastructure.

Table 4: Evaluation of Provisions Theme 2: Coordinating the development of land with infrastructure in Silverdale West

	Option 1 – Do nothing – no staging provisions	Option 2 - Deferred zoning – when all the local infrastructure upgrades are operational	Option 3 – Proposed Plan Change
<b>Description of Options</b>	This option involves putting in place urban zoning and coordinating the development of land with transport infrastructure to processes and agreements which sit outside of the AUP.	This option involves putting in place urban zonings with a precinct that applies the Future Urban Zone provisions until a certain date from which the urban zone provisions will take effect. The date will be based on the point in time when all required local infrastructure upgrades are projected to be complete.	This option coordinates development with the delivery of required transport and other infrastructure within the AUP through the inclusion of a transport staging rule and a rule for wastewater network connections to development and subdivision. The infrastructure staging rules ensure that development does not exceed GFA thresholds for land use activities or gross development area thresholds for subdivision activities until such time as the infrastructure upgrades are constructed and are operational. Subdivision and development that does not comply with staging rules requires resource consent as either a restricted discretionary or discretionary activity within the PPC provisions (Rules IX.4.1(A5 and A6) respectively). Subdivision and development that does not comply with the wastewater rule requires non-complying activity resource consent (Rules IX.4.1(A8 and A9) respectively).
<b>Benefits -</b>			
<i>Environmental</i>	Potentially avoids the complexity in the planning provisions associated with Options 2-3, although relying on existing operative zone provisions will also add complexities	This option will ensure that no development occurs prior to the necessary infrastructure being in place to service growth.	This option provides for interim development to increase commercial capacity which can be serviced without the final infrastructure upgrades required to support a full build out of the Plan Change area.
<i>Economic</i>	Removes the cost of developing rules for the applicant.	The administration of this rule is less complex than Option 3.	This option enables consenting to progress for land modification or development, which would reduce unnecessary delays in the development process. This option allows for staged development to proceed, providing associated economic benefits.
<i>Social</i>	Existing rules are retained and community expectations are maintained.	This option provides more certainty to the community than option 1 as there is assurance that development cannot occur until infrastructure is in place.	This option provides the most certainty to the community as the scale of development is tied to specific infrastructure upgrades. This option allows for staged development to proceed, providing associated social benefits, including the potential provision of open spaces and employment.
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Costs -</b>			
<i>Environmental</i>	The lack of recognition within the AUP of the required infrastructure may result in significant environmental costs if development was to proceed the required infrastructure upgrades. Management of environmental issues would be reliant on the requirement for an ITA under clause E27.3(2) and E27.9(5) which provides less certainty than Options 2 and 3.	This option does not provide for interim development to increase commercial capacity despite the traffic modelling determining the timing of the transport infrastructure upgrades and how these can be coordinated with the release of light industrial development capacity.	This option is informed by transport modelling and infrastructure assessments that have determined the timing of the transport infrastructure upgrades and servicing capacity and upgrades and how these can be coordinated with the release of light industrial development capacity.
<i>Economic</i>	This option is heavily reliant on infrastructure / funding agreements that sit outside the AUP. There is nothing in the	This option is blunt and does not enable consenting to progress for land modification or development, which	This is a more complex set of provisions which will require greater administration by Council than Options 1 & 2.



	AUP to tie the release of development capacity with the delivery of transport infrastructure.	would create unnecessary delays in the development process.	Although there are risks with this approach Council has the ability and technology to administration this it will just be a matter of putting a system in place.
<b>Social</b>	This option provides no certainty to the community as there is no transparency within the AUP regarding when development will occur.	This option will result in costs to the community as the future urban zoning will not facilitate the development of community facilities to service the existing or future community which can be serviced without the final infrastructure upgrades required to support a full build out of the Plan Change area.	The relative certainty of social benefits associated with the PPC means that there are limited social costs associated with this option.
<b>Cultural</b>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Efficiency &amp; Effectiveness</b>	This option is ineffective as there are no provisions within the plan to decline applications for development which cannot be serviced by transport infrastructure, which would not achieve B2.21(5), B3.2.1(5), B3.3.1(1)(b) or E27.2(1).	This option is highly inefficient as traffic modelling shows that the release of light industrial development capacity can be coordinated with the transport infrastructure upgrades required to service this growth Therefore, as this option allows for no additional capacity in the interim prior to the completion of the complete infrastructure upgrades it is not in keeping with B3.2.1(5).	This option will efficiently coordinate development with infrastructure and achieve the policy direction of B2.21(5), B3.2.1(5) and B3.3.1(1)(b), because the provisions stage the release of development capacity with the delivery of required infrastructure.
<b>Summary</b>	Option 3 is preferred. Coordinating development with the delivery of required transport infrastructure through the inclusion of a transport staging rule and requiring development and subdivision to be connected to the wastewater network is the most appropriate mechanism for achieving the objectives of the AUP. The proposed provisions will stage the release of development capacity with the delivery of required infrastructure and therefore is consistent with B2.21(5), B3.2.1(5) and B3.3.1(1)(b).		

### 11.4.3 Theme 3: Achieving Integrated and Quality Development

The existing AUP objectives and proposed precinct objectives which have particular relevance for Theme 3 include:

- B2.3.1 (1) A well-functioning urban environment with a quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) has improved resilience to the effects of climate change.
- B2.3.1(3) The health and safety of people and communities are promoted.
- B3.3.1(1) Effective, efficient and safe transport that: (a) supports the movement of people, goods and services... (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.
- E27.2(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.
- E27.2(5) Pedestrian safety and amenity along public footpaths is prioritised.
- E38.2(6) Subdivision has a layout which is safe, efficient, convenient and accessible.
- IX.2(7) Enable buildings of greater height within lower lying areas of the precinct to enable a range of industrial activities.
- IX.2(8) The precinct is comprehensively developed industrial environment that responds to natural site features and landform, manages the interface with surrounding land use, supports public and active transport use and respects Mana Whenua values.

**Table 5: Evaluation of Provisions Theme 3: Achieving Integrated and Quality Development**

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Description of Options</b>	<p>The street network and the provision of open spaces are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport).</p> <p>Building height is regulated by the underlying Business – Light Industry zone provisions.</p>	<p>The proposed Silverdale West Precinct includes a bespoke set of provisions to guide the development of buildings, roads and open spaces within the precinct:</p> <ul style="list-style-type: none"> <li>• Additional height areas enable building height to be optimised in the lower lying areas of the precinct to more efficiently provide for the operational requirements of industry.</li> <li>• The requirement for a planted setback to manage the interface with SH1 and Dairy Flat Highway.</li> <li>• Assessment criteria and precinct plans that guide the layout and design of key structuring elements including the street network, open space, retaining walls along the public realm, trees and mana whenua values.</li> <li>• The identification of indicative of Open Space zoning along the enhanced riparian margins of John Creek.</li> </ul>
<b>Benefits -</b>		
<b>Environmental</b>	<p>The street network, the provision of open spaces and the design and layout of development are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide and zone provisions.</p>	<p>The precinct provisions implement key structuring elements of the Development Concept Plan for Silverdale West which has been developed to ensure a high-quality development outcome result and to ensure that the subdivision layout will meet the operational requirements for light industrial development.</p> <p>The tailored precinct provisions and assessment criteria which implement the Development Concept Plan for Silverdale West will result in a collector road layout that results in a workable subdivision pattern for light industrial development.</p> <p>The application of the planted setback along SH1 and Dairy Flat Highway will ensure that the interface between the Plan Change area and existing urban development is managed to maintain visual amenity.</p> <p>The application of additional height areas through the lower lying areas of the precinct will meet the functional requirements for light industrial development.</p> <p>The planned open spaces and connected street network will support transport mode shift to active transport modes as they provide safe and convenient movement to and through the precinct.</p>
<b>Economic</b>	<p>A less complex set of planning provisions will apply within the Plan Change area.</p>	<p>The PPC provisions are tailored to specifically support the function and operational requirements of light industrial activity.</p>
<b>Social</b>	<p>Existing rules are retained and community expectations are maintained.</p>	<p>Expectations and requirements of key stakeholders, landowners and land developers can be clearly set out within the proposed precinct.</p> <p>Increases the amenity values of the Plan Change area as the future employees will enjoy the planned open spaces and connected street network which offers safety to pedestrians and cyclists.</p>
<b>Cultural</b>	<p>This option does not facilitate any improved cultural outcomes.</p>	<p>Policy IX.3(20) seeks to ensure that development responds to Mana Whenua values.</p>

Costs -		
<b>Environmental</b>	No requirement to implement the key structuring element of the Development Concept Plan for Silverdale West which responds to the specific characteristics of the Plan Change area and the unique sense of place.	This option will not result in any environmental costs.
<b>Economic</b>	Landowners, developers, the Council and community will not have clear expectations about where the future street and open space network will be located.	Cost to future applicants to prepare resource consent applications assessing additional planning provisions and implementing the requirements.
<b>Social</b>	Reduced amenity values as the provisions will not achieve an integrated and quality-built environment which responds to the characteristics of the Plan Change area to the same extent as Option 1.	This option will not result in any social costs.
<b>Cultural</b>	Reduced cultural values as the provisions do not seek to respond to Mana Whenua values.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	<p>Ineffective as the indicative collector road network and key open space network are not shown in the plan so piecemeal and ad hoc development may occur.</p> <p>Without the guidance of a precinct, the Plan Change area is unlikely to be developed in a comprehensive and coordinated manner.</p> <p>Area - specific approaches are not considered, which is less effective in achieving B2.3.1(1)(a).</p>	<p>This option is effective as the provisions seek to ensure adequate provision of public open space in accordance with Objective B2.7.1(1).</p> <p>This option is effective as the provisions seek to ensure development provides a connected street network which promotes safe cycling and a walkable urban form in accordance with B3.3.1(1) and B2.3.1(3).</p> <p>The proposed precinct meets Objective B2.3.1(1)(a) of the RPS as it ensures that subdivision, use and development will respond to the intrinsic qualities and physical characteristics of the site.</p>
<b>Summary</b>	Option 2 is the preferred option. The inclusion of a bespoke set of provisions to implement the structuring elements of the Development Concept Plan for Silverdale West and respond to the functional and operational requirements of light industrial development enables the PPC to efficiently and effectively achieve B2.7.1(1), B3.3.1(1), B2.3.1(3) and B2.3.1(1)(a).	

#### 11.4.4 Theme 5: Natural Environment

The existing AUP and proposed precinct objectives which have particular relevance for Theme 5 include:

- B7.2.1(2) Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.
- E3.2(2) Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.
- E15.2 (2) Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.
- IX3(5) Subdivision and development are managed to ensure the maintenance and enhancement of ecological values within the receiving environment.
- IX.2(6) Strong ecological outcomes are embedded within the precinct through the protection and enhancement of key streams and natural wetlands and areas of indigenous vegetation.
- IX.2(9) Development and subdivision demonstrate the integration of green networks focused on freshwater systems with open space and active mode networks through the precinct

**Table 6: Evaluation of Provisions Theme 4: Natural Environment**

	Option 1 – Rely on Auckland-wide and Zone Provisions	Option 2 – Proposed Plan Change
<b>Description of Options</b>	The natural environment is controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions.	The proposed Silverdale West Precinct largely relies on the existing Auckland-wide provisions of the AUP to manage stormwater quantity / quality, as well as works in streams / wetlands, however, does include objectives, policies and rules to support the establishment of green corridors and ecological enhancement within the areas. The PPC includes a bespoke set of provisions to enhance the natural environment: <ul style="list-style-type: none"> <li>• The requirement of a planted riparian margin along John’s Creek the key north-south waterbody, including the standard 20m esplanade reserves where the average width of the stream is 3m or more through a site.</li> <li>• The requirement for a 10m planted riparian margin along other intermittent and permanent streams within the precinct, with wider riparian margins enabled.</li> <li>• The requirement for a planted setback to manage the interface with SH1 and Dairy Flat Highway.</li> <li>• Ecological offsetting within the Precinct is acknowledged as a desirable outcome, and is otherwise subject to the standard assessment under the AUP Auckland-wide provisions.</li> </ul>
<b>Benefits -</b>		
<b>Environmental</b>	It is possible to achieve good environmental outcomes under this approach but this will rely largely on non-statutory mechanisms.	This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams and is consistent, and goes beyond, the rules included in other greenfield precincts within the AUP. The requirement to improve stormwater quality will enhance the water quality of receiving environments.
<b>Economic</b>	Less costs associated with developing along streams as there is no requirement to provide riparian planting, or costs to residents to protect and maintain the EPA.  A less complex set of planning provisions will apply within the Plan Change area.	This option will not result in any economic benefits.
<b>Social</b>	Existing rules are retained and community expectations are maintained.	Increased aesthetic and amenity values for communities as a result of riparian planting along streams and the SH1 and Dairy Flat Highway frontages.
<b>Cultural</b>	This option does not facilitate any improved cultural outcomes.	This option will enhance Mana Whenua values associated with water and the natural environment.
<b>Costs -</b>		
<b>Environmental</b>	No requirements to provide riparian planting along streams within the Plan Change area and therefore the ecological values of streams will not be enhanced.	This option will not result in any environmental costs.
<b>Economic</b>	Underutilising land that is well serviced by public transport will not result in an increase public transport patronage and the associated economic benefits.	The requirement for riparian planting and planted landscape setbacks will increase the costs when developing along streams, SH1 or Dairy Flat Highway.
<b>Social</b>	Reduced aesthetic and amenity values for communities from a lack of riparian planting along streams and planting along the SH1 or Dairy Flat Highway Road frontage.	This option will not result in any social costs.
<b>Cultural</b>	Reduced cultural values associated with a lack of indigenous biodiversity along streams.	This option will not result in any cultural costs.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or effective and will not achieve B7.2.1(2), E3.2(2) and E15.2 (2) as there is no requirement to plant riparian margins along streams and therefore there is	This option is efficient at achieving B7.2.1(2), E3.2(2) and E15.2 (2) as they ensure that indigenous biodiversity along streams is restored to enhance the ecological values of streams while maintaining flexibility for appropriate development of cycle and pedestrian paths.

	no assurance that indigenous biodiversity along streams will be restored to enhance the ecological values of streams.	
<b>Summary</b>	Option 2 is the preferred option. The inclusion of a bespoke set of provisions to enhance the natural environment enables the PPC to efficiently and effectively achieve B7.2.1(2), E3.2(2) and E15.2(2) IX.3(16) to IX.3(20).	

### 11.5 RISK OF ACTING OR NOT ACTING

In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in the report above. For this reason, an assessment of the risk of acting or not acting is not required.

### 11.6 SECTION 32 ANALYSIS CONCLUSION

On the basis of the above analysis, it is concluded that:

- The proposed objectives in the Silverdale West Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable appropriate urbanisation of the site
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.



## 12.0 CONCLUSION

This report has been prepared in support of the applicant's request for a PPC to the provisions of the AUP to rezone 107.35-hectares of land in Silverdale West for urban activities.

The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991, and the preparatory work has followed Appendix 1 of the AUP – Structure Plan Guidelines.

Based on an assessment of environmental effects as set out in section 10 of this report and the specialist technical assessments that have informed the PPC, it is concluded that the PPC will have positive effects on the environment in terms of the social and economic well-being of the community as well as the enhancement and protection of waterways. Where adverse effects are anticipated, the proposed policies and rules of the PPC, in addition to those in the Auckland-wide and zone provisions, will ensure they are appropriately avoided, remedied or mitigated.

An assessment against the provisions of section 32 of the RMA is provided in section **Error! Reference source not found.** of the report. This includes an analysis with respect to the extent to which the objectives of the PPC are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the PPC are the most appropriate way to achieve the objectives. That analysis concludes that:

- The proposed objectives in the Silverdale West Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a comprehensive suite of planning provisions to enable appropriate urbanisation of the site
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and development of the subject land into the foreseeable future; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.

For the above reasons, it is considered that the proposed PPC accords with the sustainable management principles outlined in Part 2 of the RMA and should be accepted and approved.