

Request for Private Plan Change

Proposed Plan Change: Whenuapai Green

Neil Construction Limited

For land at 98-100 and 102 Totara Road, Whenuapai

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1.0 Executive Summary

This Private Plan Change request ('PPC') seeks to make changes to the Auckland Unitary Plan – Operative in Part ('AUP') to enable the rezoning of 98-100 and 102 Totara Road, Whenuapai, collectively referred to as Whenuapai Green ('PPC land'). Whenuapai Green comprises an approximate land area of 16.36 ha over two allotments.

The PPC seeks to rezone the PPC land from Future Urban Zone ('FUZ') to Residential – Mixed Housing Urban Zone ('MHU'). The PPC seeks to apply a new Whenuapai Green Precinct and SMAF control to the PPC land. The proposal is intended to enable the development of a comprehensive medium-density residential community that will seamlessly integrate with the surrounding existing uses and wider Whenuapai township. It seeks to provide for housing choice and variety in a strategic location that is within close proximity to key transport connections, amenities, and services to support the envisaged residential growth, and where this form of residential development is anticipated.

The PPC is considered to be consistent with higher order statutory plans and documents, including the Auckland Plan 2050, the Auckland Regional Policy Statement ('ARPS'), the Future Development Strategy 2023 ('FDS') and the National Policy Statement on Urban Development 2020 ('NPSUD'). It is also consistent with the Whenuapai Structure Plan 2016 ('WSP').

The section 32 analysis has confirmed that the proposed MHU zone with a site-specific precinct and SMAF control is the most appropriate approach for the PPC land. Through that evaluation, it has been determined that enabling residential development is more appropriate than the status quo or rezoning of the land to MHU zone without a Precinct or utilising an alternative spatial area.

The PPC land is situated in a strategic location within close proximity to everyday services and amenities within the Whenuapai township, which contains a range of food, retail and commercial services, and key transport links – including State Highways 16 and 18 – as well as public transport services that provide connections to the wider Auckland region. In addition, the PPC land is close to the commercial and residential centres at Westgate and Hobsonville, which offer a wide range of facilities and amenities that will further support residential-zoned land in Whenuapai.

The anticipated population growth of Whenuapai will need to be supported by high-quality housing in a suitable location within close proximity to local services, such as schools, outdoor space, and everyday amenities that support the vitality of neighbourhoods and the people who live there.

The request has been carefully designed to consider the ecological features of the PPC land, such as the stream to the east of the PPC land and riparian and wetland areas elsewhere across the

land. These features will be enhanced from their current state via extensive native planting and restoration, as well as the implementation of a comprehensive stormwater management approach to safeguard the PPC land and surrounding environment into the future.

A comprehensive assessment of environmental effects potentially generated by the PPC has been undertaken. Any adverse effects generated by the PPC will be minor and satisfactorily mitigated, whilst still achieving positive effects from the development that would be enabled by the PPC. This assessment showcases that the Whenuapai Green Precinct and the MHU zoning are the most appropriate way to achieve the envisaged outcomes for the PPC land.

It is therefore considered that a PPC is the most appropriate way of achieving the purpose of the RMA. The PPC is supported by a range of technical expert assessments to confirm that conclusion.

2.0 Private Plan Change Applicant and Property Details

Applicant:	Neil Construction Limited
Address for Service:	C/- Campbell Brown Planning Limited P O Box 147001 Ponsonby AUCKLAND 1144 Attention: Philip Brown / Michelle Kemp / Isobel Lee Email: philip@campbellbrown.co.nz or michelle@campbellbrown.co.nz or isobel@campbellbrown.co.nz <i>(all written correspondence via email please)</i>
PPC land Location:	98-100 and 102 Totara Road, Whenuapai
Legal Description:	Lot 2 DP 81411 held in record of title NA38B/84 and Lot 1 DP 53062 held in record of title NA4A/1477
PPC land Area:	98-100 Totara Road: 11.61 ha 102 Totara Road: 4.75 ha Total Site Area: 16.36 ha
Current AUP Zoning:	Future Urban Zone
AUP Overlays:	Natural Resources: High-Use Aquifer Management Areas Overlay – Kumeu Waitematā Aquifer Infrastructure: Aircraft Noise Overlay – Whenuapai Airbase – noise control area (55 dBA)
Controls:	Macroinvertebrate Community Index – Exotic & Rural
Designations:	Airspace Restriction Designations – ID 4311, Defence purposes – protection of approach and departure paths (Whenuapai Air Base), Minister of Defence

3.0 PPC land Location



Figure 1 – PPC Location



Figure 2 – PPC location within the wider surrounding area

4.0 PPC Land Context

4.1 The Private Plan Change Land

The PPC Land contains two separate properties that are under unconditional agreement for purchase by Maraetai Land Development Limited ('MLDL'). NCL is acting as agent for MLDL and has a Joint Venture agreement with MLDL to develop the properties. The PPC land forms a total area of 16.36 ha and has frontage on to both McCaw Avenue and Totara Road. The site is generally rectangular in shape, excluding the northern boundary which follows the angle of Totara Road and a rectangular arm to the east. The PPC land has a slight slope, with a gradient falling from RL 25.5 to RL 15 across the land.

The PPC land is predominantly open pasture, with buildings located in the northern and south-western corners of the PPC land. The buildings to the north are comprised of a single dwelling and a detached garage, and the buildings to the south-west include two dwellings and a barn. Two vehicle crossings are provided off Totara Road for the existing buildings.

4.2 Hydrology

The Auckland Council GIS viewer shows multiple overland flow paths throughout the PPC land. The overland flow paths on the PPC land are associated with two different catchments, as well as the associated 1% AEP flood plains (as shown by **Figure 3** below). The overland flow paths over the eastern arm of the PPC land forms an intermittent stream which flows gently northward to Rarawaru Creek and then on to Waitematā Harbour.



Figure 3 - Catchments and hydrology of the PPC land

4.3 Ecology

An investigation into the freshwater ecology of the PPC land was undertaken by Viridis and an Ecological Impact Assessment ('EIA') provided in **Appendix A** prepared, which outlines the ecological features of the PPC land.

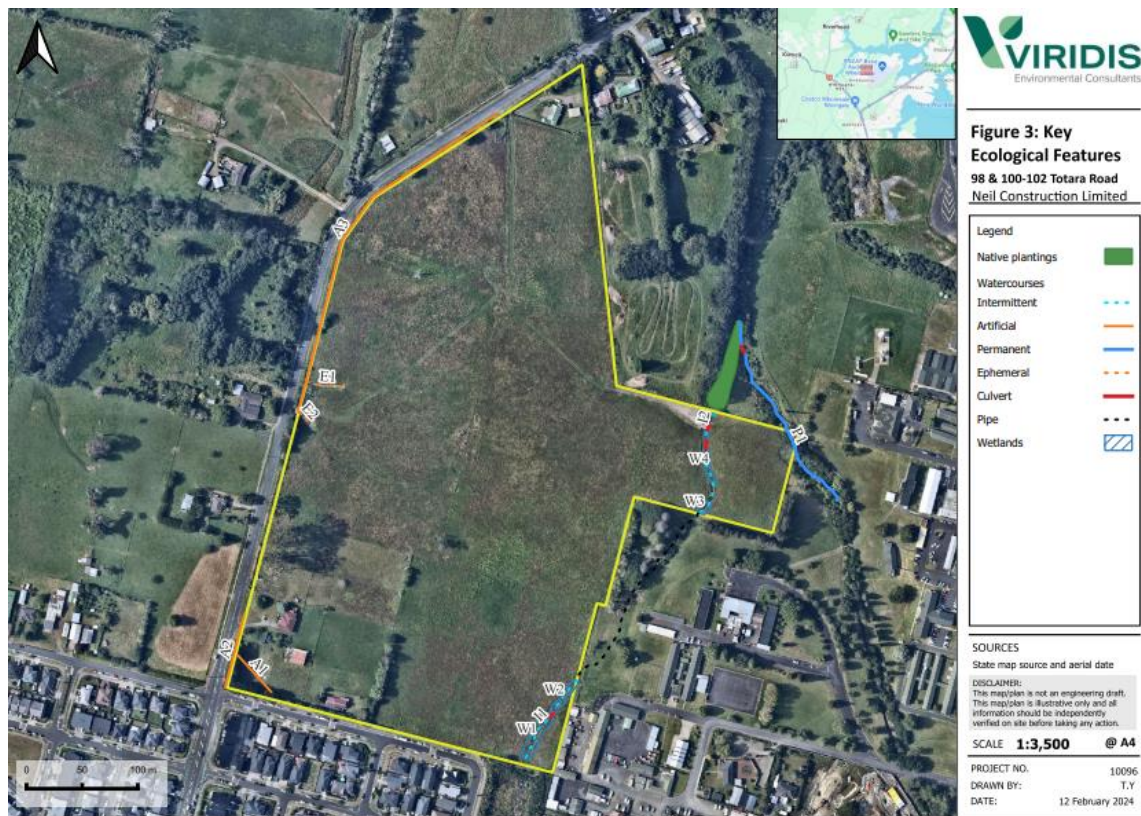


Figure 4 - Ecological features within the PPC land

Three artificial channels were identified along the western side of the site, in addition to two ephemeral streams. Two intermittent streams were identified in the eastern areas of the PPC land, which also contain multiple natural wetlands. A permanent stream, identified as an unnamed tributary of the Rarawaru Creek, traverses the eastern corner of the PPC land.

4.4 Infrastructure

The PPC land has no existing stormwater infrastructure. Stormwater drains naturally via overland flow paths and streams present on the land. No built wastewater infrastructure is present on the PPC land other than private septic tanks. Existing water connections are located on the western side of Totara Road.

4.5 Surrounding Environment

It is considered that Whenuapai has already undergone a significant degree of change, from a solely rural environment, to a state of semi-urbanisation. Whilst some land surrounding the PPC land is still in a semi-rural state, such as to the north and west, the land to the south is comprised of the recently developed Whenuapai Township and the Royal New Zealand Air Force ('RNZAF') Base Auckland is located directly to the east.

Further urbanisation has occurred over the past 20 years between Massey North/Westgate and Hobsonville, a master-planned community, which reflects a consistent process of urban rezoning in Auckland’s north-west. Whenuapai is the next logical step for urbanisation in the north-west, as outlined in several key strategic documents referred to throughout this report.

4.5.1 Adjacent sites

The immediate surrounding environment is characterised by both rural and residential activities. The north-eastern boundary of the PPC land is bordered by lifestyle properties that contain clusters of buildings and vegetation, such as mature trees along the shared boundary with 94 Totara Road.

The RNZAF Base Auckland is located further to the east of the PPC land. The RNZAF Base Auckland is a prominent feature of the Whenuapai landscape and community and has a number of designations in place to protect and enable its operations. The airbase provides for a range of functions and infrastructure to support its ongoing operations, with multiple runways, open space and an assortment of buildings and other services.

The land to the north and west of the PPC land is generally comprised of more rural land uses, predominantly rural lifestyle properties that contain dwellings and a range of other ancillary buildings. Pockets of vegetation are located across the neighbouring sites, as well as open pasture and streams.

Directly to the south of the PPC land is the Whenuapai Township, which is comprised of a range of medium-density housing, local services and amenities, and recreation space. McCaw Avenue borders the southern edge of the PPC land, separating the existing dwellings along the street from the PPC land.

4.5.2 Royal New Zealand Air Force Base

The 300-hectare airbase was constructed in 1942 to serve the Pacific and remained operational after World War 2 for both military and commercial purposes until 1965 when Auckland International Airport opened in Māngere for commercial flights. Military operations have continued at the airbase since then, operating as a RNZAF Base Auckland.

The airbase is a dominant feature within the Whenuapai landscape and has a number of designations on the site, and outside its boundary to protect and enable its operations. These designations place some restrictions on adjoining land use and development by limiting the height of structures and requiring written approval from the New Zealand Defence Force (‘NZDF’) for changes of land use or subdivision on sites located within the protection measures boundary.

The Base comprises two runways (and associated vacant land), hangars and terminal buildings, barracks and housing, and sports and conference facilities. It has been maintained at an operational level, and currently has over 1,000 personnel and support units, making it the largest RNZAF airbase in the country.

4.5.3 Whenuapai Township

The Whenuapai township is located directly to the south of the PPC land and is a rapidly growing suburb of Auckland that is characterised by the extensive coastline of the Upper Waitematā Harbour. Whenuapai is well connected to the wider Auckland Region via State Highways 18 and 16, providing connections to both north and west Auckland.

Whilst historically a rural village on the fringe of Auckland, Whenuapai is now one of the fastest growing areas in the north-west. The WSP sets out the framework for how the area is to transform into an urbanised community with 5,000 new homes, a range of employment precincts, and a new town centre.

The Whenuapai centre includes a range of services and amenities, such as schools, food and retail stores, and community facilities. The WSP envisages that the centre will grow further to service residential development within the Whenuapai area.

It is considered that the Whenuapai township and the wider surrounding area has and is still undergoing a significant degree of change from a semi-rural area towards a state of urbanisation.

4.5.4 Westgate

Westgate Centre is located approximately 2.5 km to the south of the PPC land on the western side of Stage Highway 16. It is a growing employment hub and metropolitan centre that provides a range of service and amenities, such as retail, commercial, social, and recreational services, for Whenuapai and the wider surrounding northwest region.

4.5.5 Hobsonville

Hobsonville is an established suburb approximately 3 km to the east of the PPC land, on the southern side of the Upper Harbour motorway (State Highway 18). The suburb has a coastal setting and borders the Waitematā Harbour. A small local centre provides services for the established medium-to-high density residential neighbours.

Hobsonville Point, to the northern end of the suburb, is a master planned community that is located on land that has been redeveloped from a former airfield to a mixed residential and commercial/industrial area. The Hobsonville Corridor Precinct is located between Hobsonville

Road and State Highway 18, extending eastwards to Memorial Park Lane at the Hobsonville Domain and provides for a number of commercial activities.

Directly to the south of Hobsonville Point is Scott Point, another residential neighbourhood that is anticipated to accommodate approximately 20,000 new residents.

4.5.6 Special Housing Areas

Significant existing urban areas and large areas of FUZ land are located within five kilometres of the PPC land. This includes three Special Housing Areas ('SHA'), as shown by the below figure.

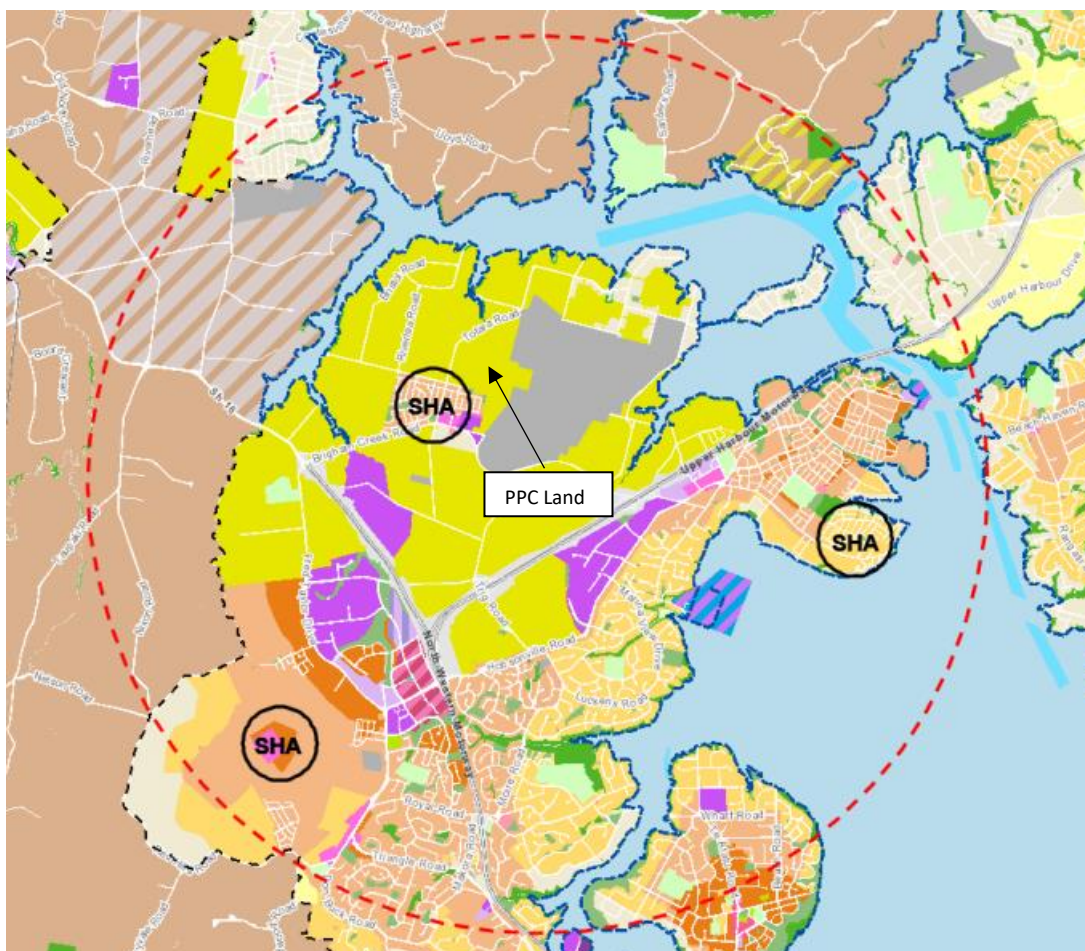


Figure 5 - Special Housing Areas in relation to the PPC land

Whenuapai Village is one of the SHAs, which included the redevelopment of a 31.4 ha landholding located on the western corner of Brigham Creek Road and Totara Road. The site was rezoned from FUZ to MHU zone to facilitate the development of 651 residential lots and the creation of a town centre and neighbourhood park, as well as transport upgrades and provision of infrastructure. Scott Point and land near Westgate compromise the remaining SHAs shown in the above figure.

4.5.7 Plan Changes

Additional private plan changes have been approved or are currently being processed in the surrounding Whenuapai area. As shown by the below figure, there are multiple plan changes located within the surrounding area.



Figure 6 - Nearby Plan Changes

Plan Change 69 ('**PC69**') was made operative in March 2023 and rezoned the 52 ha land holding from FUZ to Business – Light Industry Zone ('**LIZ**'). T

Plan Change 86 ('**PC86**') was made operative in October 2024 by Auckland Council and rezoned 5.2 ha of land from FUZ to MHU.

Whenuapai Business Park Plan Change ('**WBPPC**') was recently notified and the submission period closed on the 6th December 2024. The plan change is being undertaken by NCL and proposes to rezone approximately 47.5 ha of land from FUZ to LIZ.

It is also noted that a range of other plan changes in the Whenuapai area have either been lodged with Council or will be lodged with Council in the near future.

Whilst it is noted that the PPC land is not located within the Council initiated Plan Change 5 ('**PC5**') area, it is considered relevant to the history and vision for the Whenuapai area. PC5 was publicly notified by Auckland Council on 21 September 2017. It sought to rezone 351 ha of land

in the southern and eastern parts of Whenuapai from FUZ to a mix of residential and business zones. The PC5 area in relation to the existing zoning is shown below:

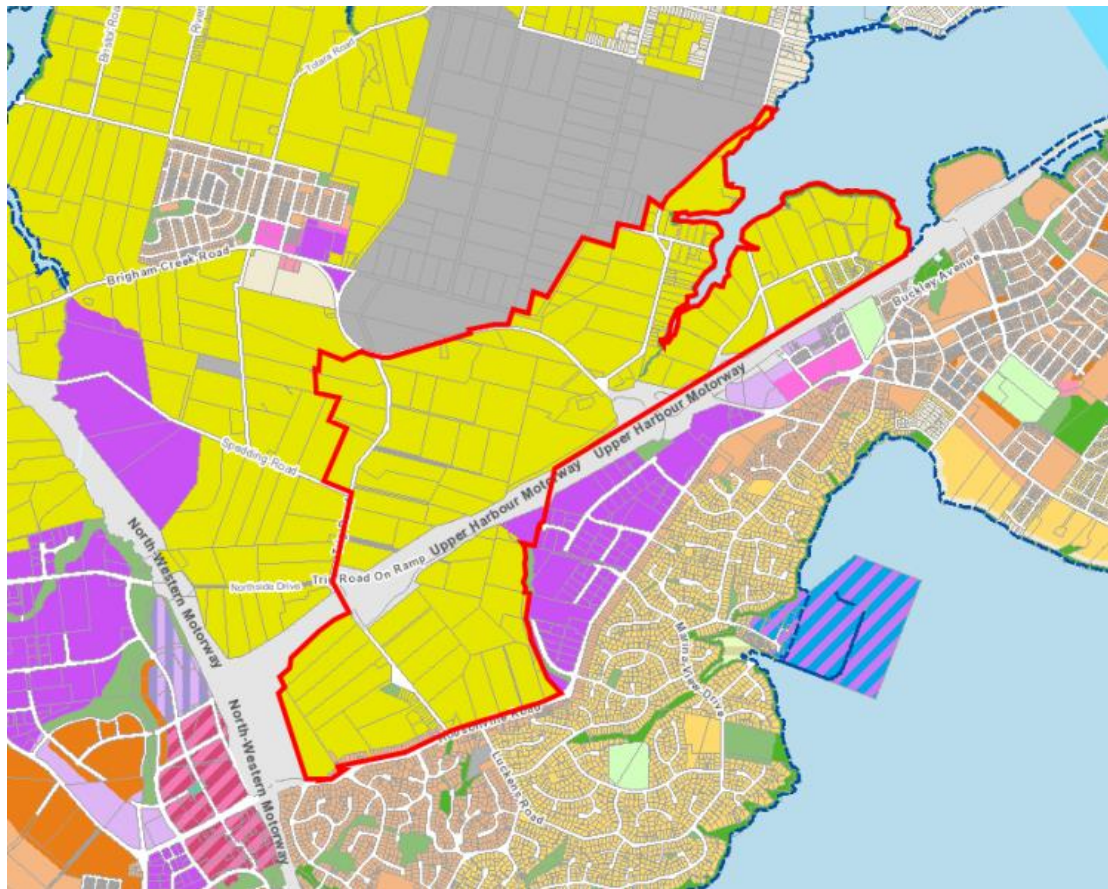


Figure 7 - PC5 area shown within red line

PC5 was withdrawn by Auckland Council on 16 June 2022, nearly five years after it was publicly notified. Prior to the withdrawal of PC5, Auckland Council sought feedback on a draft variation to PC5 (Variation 1). The below figure shows the final proposed zoning of PC5 Variation 1 area:

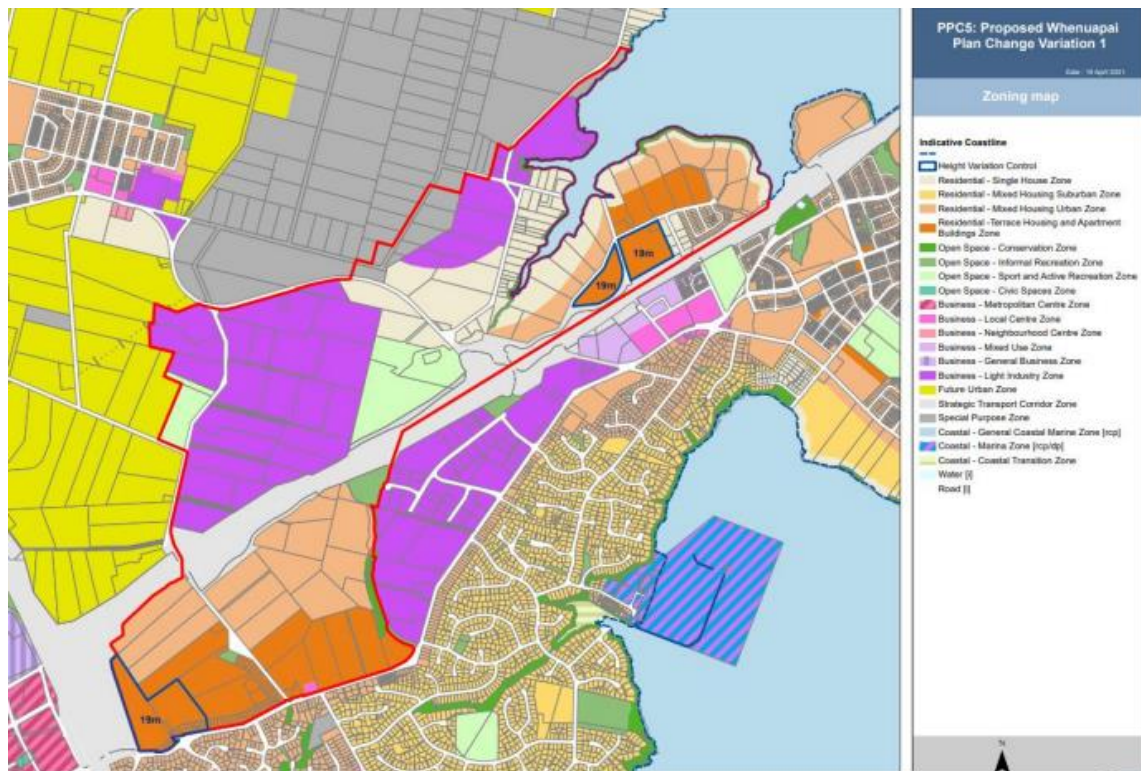


Figure 8 - PC5 draft Variation 1 proposed zoning

Although it is acknowledged that PC5 has been withdrawn and did not include the PPC land, it is considered to represent the development outcomes sought for Whenuapai and further highlights the suitability of urbanising the area due to a range of technical reports and plans that were prepared to support PC5.

4.5.8 North-West Wildlink

The PPC land is located within proximity to the North-West Wildlink. The Wildlink aims to create safe, connected, and healthy habitats for native wildlife across Auckland by undertaking restoration, planting, and pest management across the north-west. Due to the proximity of the PPC land to the Wildlink, provisions have been made to ensure the riparian and wetland areas are restored and enhanced to contribute to the North-West Wildlink vision of creating healthy habitats in the north-west.



Figure 9 - North-West Wildlink Corridor

4.5.9 Urban Ngahere Strategy

Auckland’s Urban Ngahere Strategy outlines the benefits of our urban ngahere (forest) and sets out a strategic approach to growing and protecting it. The strategy aims to increase canopy cover to 30% across Auckland’s urban area, and at least 15% in every local board area. The strategy contains a range of principles such as preference for native species, diversity of planting, protection of mature trees and creation of ecological corridors. The PPC acknowledges the importance of providing for canopy cover whilst considering the existing uses surrounding the PPC land.

5.0 Planning Controls

5.1 Zoning

The PPC land is currently zoned FUZ. The FUZ applies to greenfield land which is earmarked for urbanisation. Under the zone, the land can be used for a range of predominantly rural activities but generally cannot be used for urban activities until rezoning occurs. The below figure shows the PPC land zoning and the zoning of the immediate surrounding area.

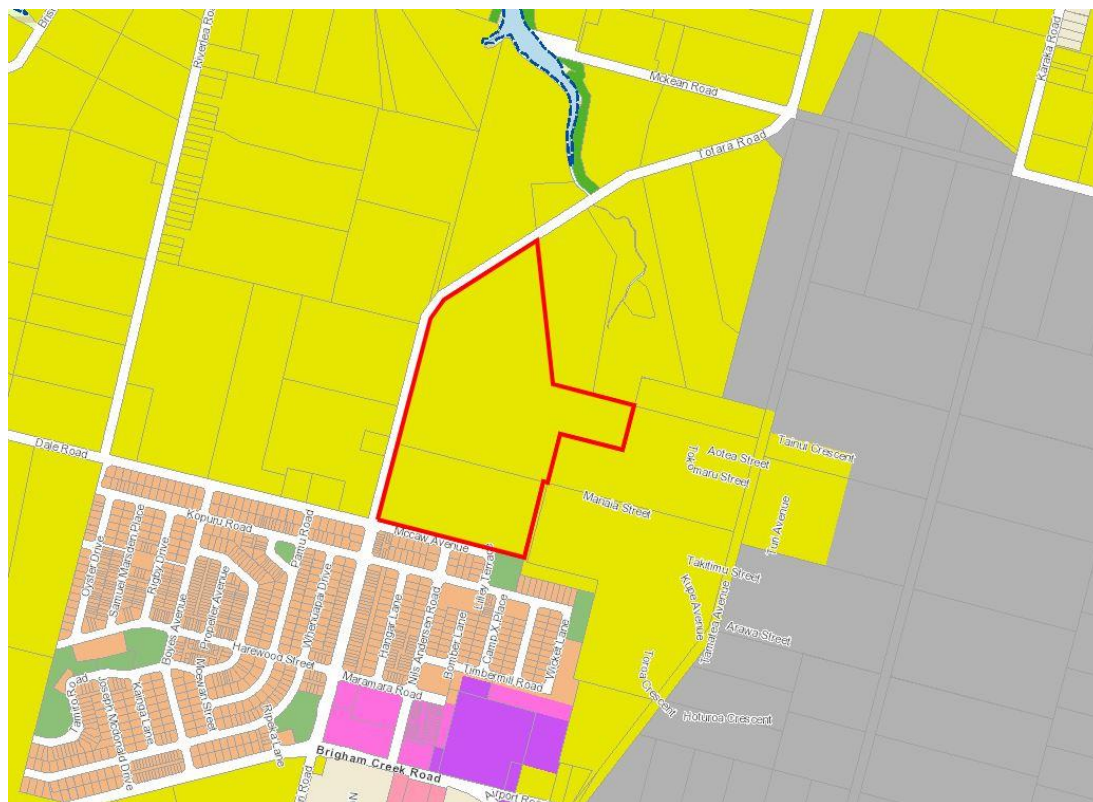


Figure 10 - AUP Zoning (FUZ shown in yellow)

5.2 Overlays & Controls

There are a number of overlays and controls that apply to the PPC land, which are outlined below:

- Natural Resources: High-Use Aquifer Management Areas Overlay – Kumeu Waitematā Aquifer
- Macroinvertebrate Community Index Control – Exotic & Rural

The above overlay and control do not impose any material restrictions on the proposed rezoning of the land.

- Aircraft Noise Overlay – Whenuapai Airbase – noise control area (55dBA)

The northern point of the PPC land is subject to the Aircraft Noise Overlay, as shown by the below figure. The overlay consists of two aircraft noise areas, however, a relatively small portion of the PPC land is only subject to the 55 dBA area. Therefore, this portion of the PPC land is subject to additional considerations under the AUP.

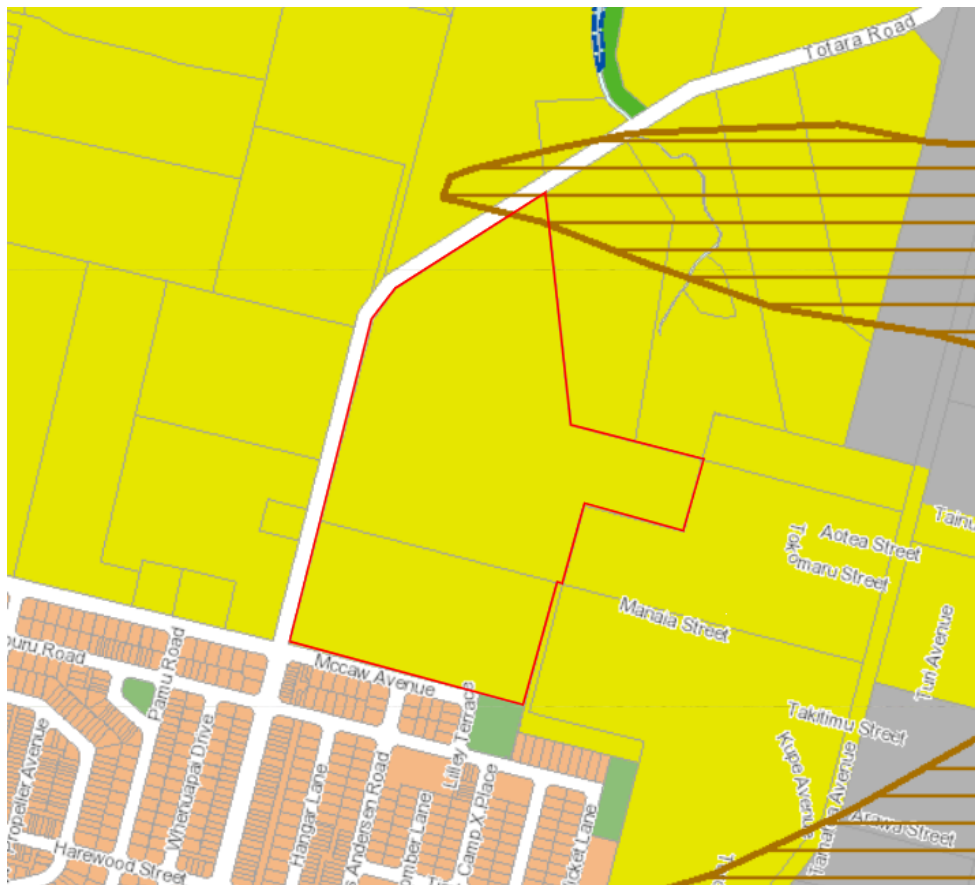


Figure 11 - Aircraft Noise Overlay in relation to the PPC land

- Historic Heritage and Special Character – Historic Heritage Overlay Extent of Place – 232, Officers’ Mess

The Officers’ Mess is a Category B feature; *historic heritage places that are of considerable significance to a locality or greater geographic area, with no specified primary feature*. Its heritage values are listed as ‘A’ (historical) and ‘F’ (physical attributes). The extent of place shown on the AUP GIS map, as shown by the below figure extends a maximum of 5 m into the PPC land. No obvious features that reflect historical heritage values or physical attributes are located within the PPC land, other than pasture.

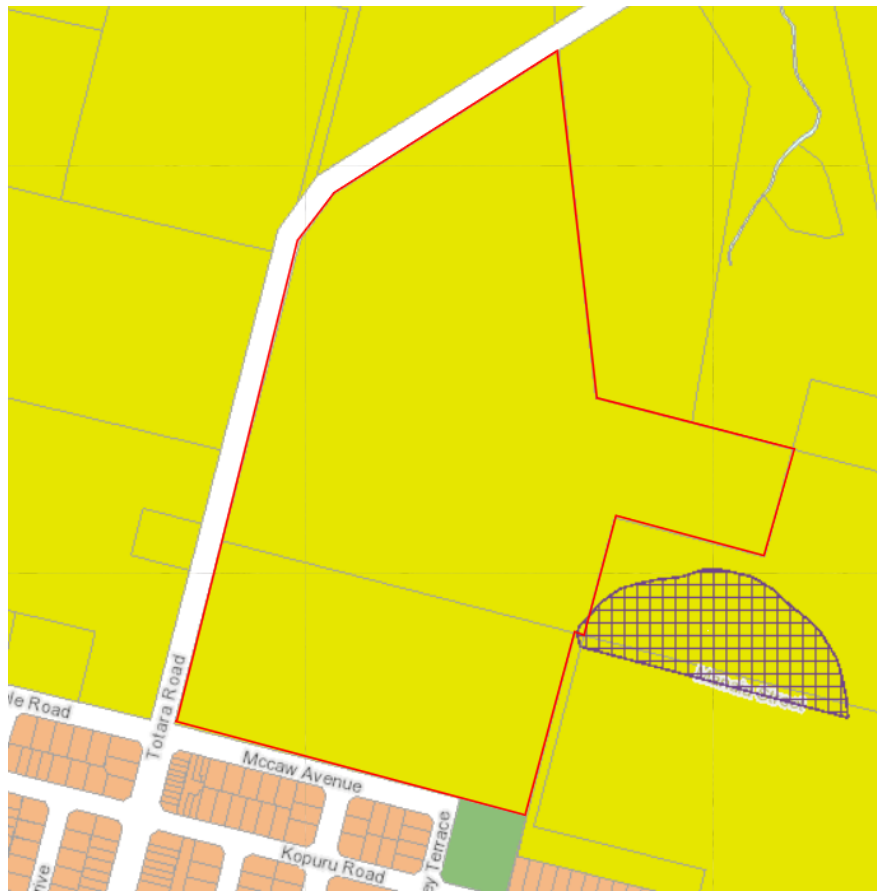


Figure 12 - Historic Heritage Overlay in relation to the PPC land

5.3 Designations

The entirety of the PPC land is located within the Airspace Restriction Designation – ID 4311, Defence purposes – protection of approach and departures paths (Whenuapai Air Base), Minister of Defence, as shown by the below figure.

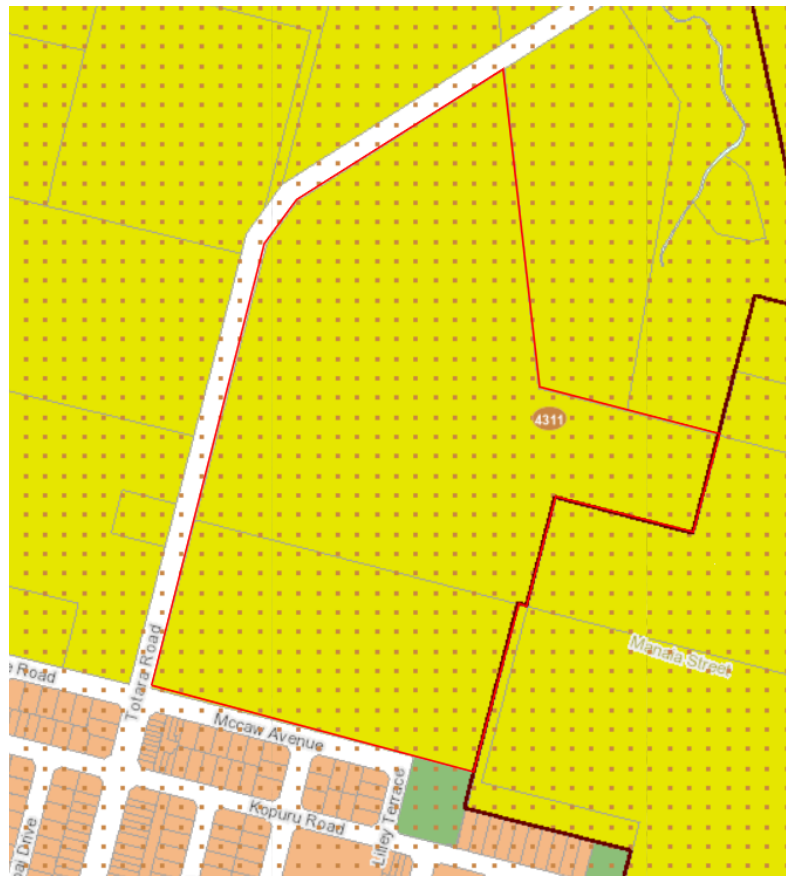


Figure 13 - Designation 4311 in relation to the PPC land

The designation requires approval from NZDF for land use and subdivision located within the lower part of the runway approach paths, generally within 1 km of the runway. The land subject to NZDF approval is shown by the below figure.

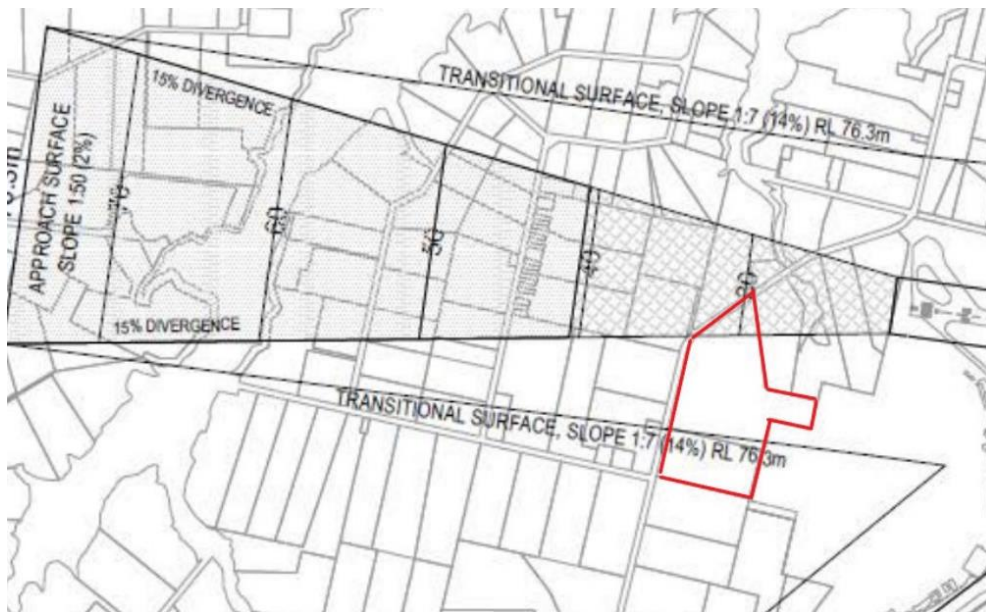


Figure 14 - Land use and subdivision subject to NZDF approval

The northern tip of the PPC land is located within the area that requires approval from NZDF, with the remainder of the PPC land being located outside the area which requires approval. The relevant conditions on Designations 4311 relating to approvals are reproduced below:

- 1. The approval in writing of the New Zealand Defence Force is required prior to the erection of any building, change in use of any land or building, or any subdivision of land, and prior to any building or resource consent application for such works/activities, within the areas of the designation shown on the planning maps as 'land use and subdivision subject to NZDF approval'. These areas are generally within 1,000 metres of the runways.*
- 2. No obstacle shall penetrate the approach and departure path obstacle limitation surfaces shown on the planning maps and explained by the text "Explanation of Protection Surfaces Whenuapai Airfield" and Diagram MD1A below without the prior approval in writing of the New Zealand Defence Force. This restriction shall not apply to any building being erected which has a height of not more than 9.0 metres above natural ground level.*

The PPC land is bordered by Designation – 4310, Defence purposes (Whenuapai Air Base), Designations, Minister of Defence, however, the designation does not extend over the PPC land so is not considered further.

6.0 Project Background

6.1 Strategic History of Auckland’s North-West

The north-west region of Auckland has been earmarked for future urban growth since the late 1990s-early 2000s and a range of strategic documents have been produced over the last two decades to support urban growth in the north-west.

The Auckland Regional Growth Strategy, prepared in 1999, identified the area immediately south of Whenuapai, as well as land along Hobsonville Road and at Westgate, as future growth areas.

In 2010, the former Waitakere City Council ‘Best for West’ – Growth Management Strategy for Waitakere was published. That strategy suggested staged new development at Redhills, Trig Road, and Whenuapai and prioritised structure planning for the Whenuapai Business Area and Hobsonville Corridor West. The structure planning exercise undertaken by the Council in 2016 generally aligned with the approach of this strategy.

6.2 Whenuapai Structure Plan

The WSP was published by Auckland Council in September 2016 following an extensive public consultation process.

The WSP sets out the framework for transforming Whenuapai from a semi-rural environment to an urbanised community over the coming decade. The WSP guides future development by defining land use patterns and the location, timings, and provision of infrastructure. The below figure shows the PPC location in relation to the WSP:

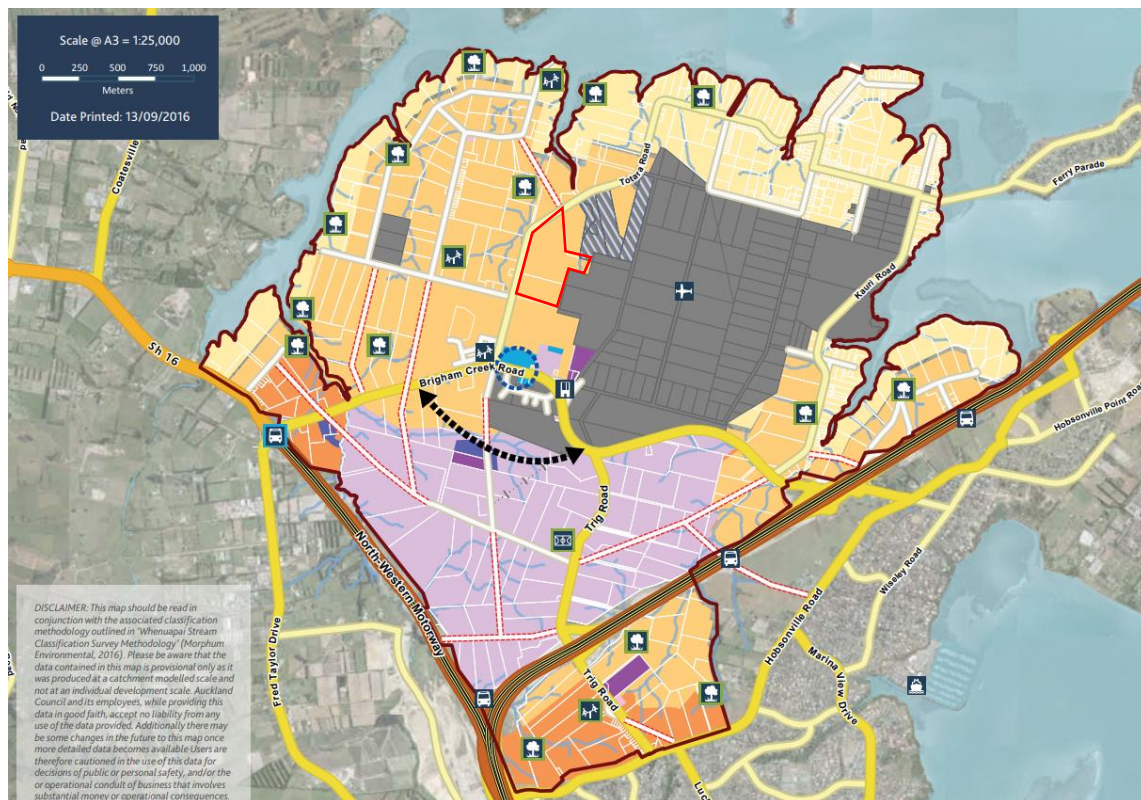


Figure 15 - Whenuapai Structure Plan

The PPC land is consistent with the land use anticipated by the WSP, being medium density residential land uses.

6.3 Fast Track Consent Application

Resource consent for 346 residential lots and associated infrastructure was sought under the Covid-19 Recovery (Fast-track Consenting) Act 2020. An application to the Minister for the Environment for referral to use the process was made in October 2021. The request for referral was subsequently approved by the Minister and a resource consent application was then lodged in January 2023 with the Environmental Protection Agency.

The application was subsequently declined by the expert consenting panel due in part to the proposal being considered inconsistent with the FUZ and not appropriate to occur without the rezoning of the land occurring first. This finding underpins the PPC, which is now sought to enable the development of the land for the envisaged residential purposes.

7.0 Land Supply Documents

7.1 Future Urban Land Supply Strategy

The Future Urban Land Supply Strategy ('FULSS') was adopted by Auckland Council in July 2017 to determine the sequencing and timing of bulk infrastructure, as well the urbanisation of future urban areas. Under the FULSS, the PPC land is located within the Whenuapai Stage 2 area and identified as development ready in 2028-2032. The timing is shown by the below figure.

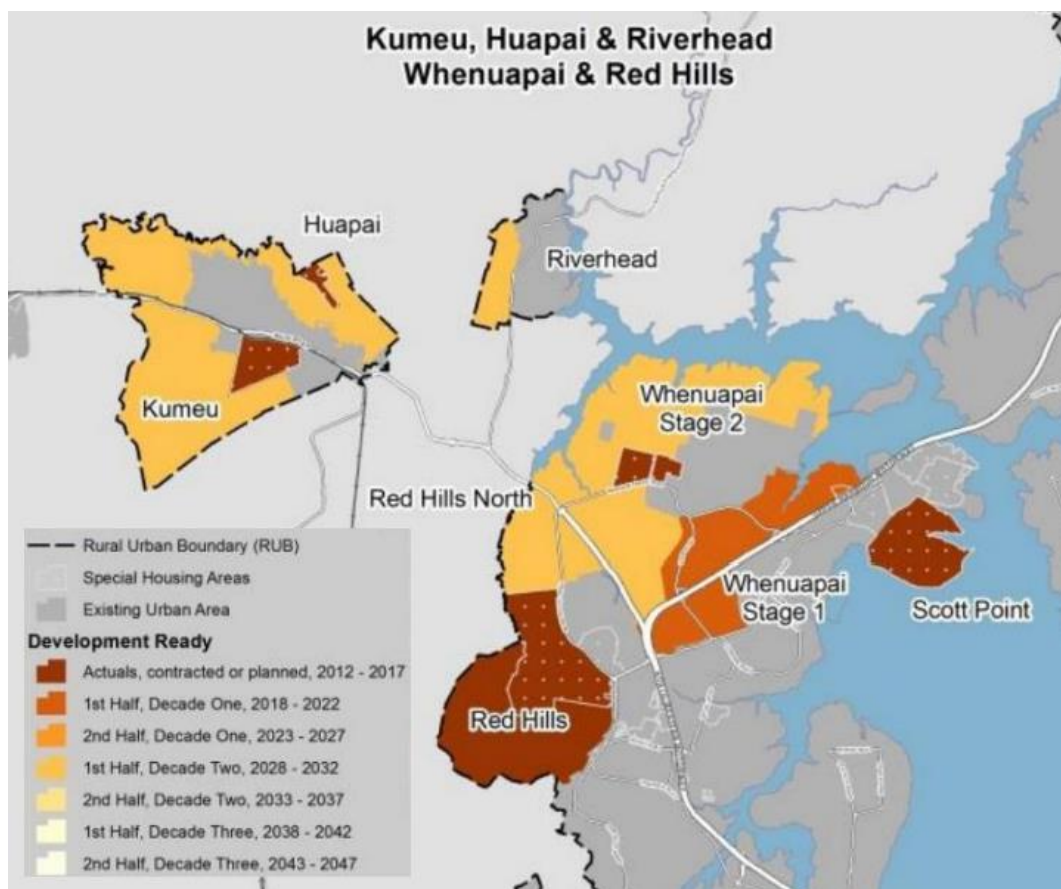


Figure 16 - FULSS sequencing of Whenuapai area

The FULSS provides useful background on the Council's growth planning in Whenuapai but has now been superseded by more recent strategic planning documents referred to below.

7.2 Future Development Strategy

The **NPSUD** requires Auckland Council to develop a future development strategy to manage growth in Auckland for the next 30 years. The FDS was approved for adoption on 2 November 2023 and replaces the FULSS and the 2018 development strategy contained within the Auckland Plan 2050.

Under the FDS, the PPC land is located within the Whenuapai North (Stage 1) area and is identified as being live zoned from 2035+ (refer **Figure 17** below).

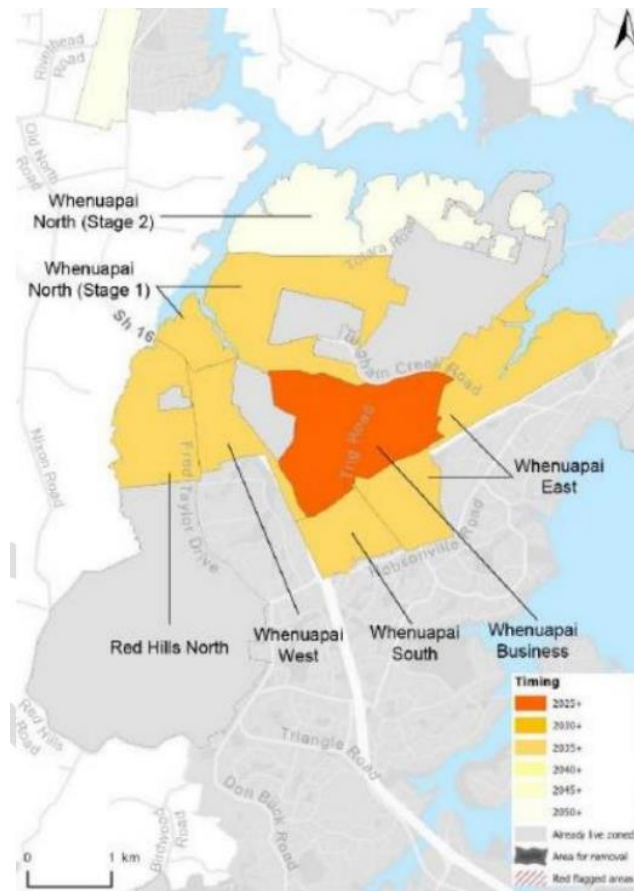


Figure 17 - FDS sequencing of Whenuapai area

8.0 Private Plan Change Request

8.1 Introduction

The applicant makes this request, seeking a plan change to the AUP.

This plan change is referred to as ‘Proposed Plan Change [number to be assigned by Council] (Private): Whenuapai Green.

The PPC seeks to amend the AUP planning maps contained within the Council’s GIS mapping layer, so that the PPC land is re-identified from FUZ to MHU zone. It also proposes a Precinct (referred to as the ‘Whenuapai Green Precinct’) to appropriately manage the effects of future development on the PPC land and proposes to apply a SMAF control to the land. Removal of the Historic Heritage Overlay Extent of Place from the land is also proposed. The PPC seeks to enable the land to be urbanised for residential purposes. This has been determined as the most suitable option in accordance with the requirements of Section 32 of the RMA.

8.2 The vision for the PPC land

NCL has had a presence in Whenuapai for a number of years and has multiple land holdings across the Whenuapai area. The PPC land has been anticipated to be developed for residential purposes for a considerable period of time and has culminated in this PPC request to achieve the envisaged residential use of the PPC land. The overarching objective of the PPC is to deliver a comprehensive and integrated residential development in an optimal location to everyday needs, amenities, and transport connections.

NCL has formed a project master planning team that has undertaken a comprehensive review of the PPC land and builds off the work previously undertaken for the land. The core project team includes NCL – engineering; Viridis – ecology; Urban Acumen – urban design; LA4 Landscape Architects – landscape and visual; Abley – transportation; Campbell Brown Planning – planning assessment; Clough & Associates – archaeology; CMW Sciences – geotechnical; Earcon – acoustic; and Geosciences – contamination.

The PPC is a culmination of extensive work undertaken by the project team, in collaboration with Auckland Council, Auckland Transport, Healthy Waters and Mana Whenua. It is considered that the PPC achieves the anticipated use of the land for residential purposes, whilst still maintaining and enhancing the key features and attributes of both the PPC land and surrounding environment.

With Whenuapai being earmarked for residential growth for a considerable period of time, and its ideal location within close proximity to key transport connections, and everyday amenities, the PPC will enable the development of land that would otherwise remain underutilised.

To achieve the Whenuapai Green vision, a Precinct Plan and accompanying provisions have been prepared to ensure future residential development is integrated with the wider aspirations of Whenuapai and the wider surrounding north-west region of Auckland. Key drivers of the Precinct Plan and associated provisions were the appropriate timing and provision of the required infrastructure, protection of ecological features and the safeguarding of surrounding existing uses to ensure their function is not inhibited by any future residential development.

8.3 Requirements of the Act

Part 2 of Schedule 1 to the Resource Management Act ('RMA') sets out the procedure to be followed when making a request to change a Plan. Key elements of the process, in the context of this proposal, are noted below:

- Any person may request a change to the AUP;¹
- The request shall be in writing to the Council;²
- The request shall explain the purpose of the proposed plan change and the reasons for the change;³
- The request shall include an evaluation report prepared in accordance with s32 RMA;⁴
- The request shall include a description of the environmental effects anticipated from implementation of the plan change;⁵
- The Council can require the applicant to provide further information;⁶
- The Council shall either adopt the request, accept the request, deal with the request as if it were an application for resource consent, or reject the request;⁷
- Notification of the Plan Change will occur if the Council decides to adopt or accept the request, and any submissions will be considered by the Council at a hearing;
- The Council may decline the plan change, approve it, or approve it with modifications.⁸

An important part of the plan change process is the s 32 RMA requirement to undertake an evaluation of the costs and benefits of alternatives. The most relevant parts of s 32 in terms of process are set out in clauses (1)-(3), which state as follows:

32 Requirements for preparing and publishing evaluation reports

(1) *An evaluation report required under this Act must—*

¹ Clause 21(1), Schedule 1, RMA

² Clause 22(1), Schedule 1, RMA

³ Clause 22(1), Schedule 1, RMA

⁴ Clause 22(1), Schedule 1, RMA

⁵ Clause 22(2), Schedule 1, RMA

⁶ Clause 23, Schedule 1, RMA

⁷ Clause 25, Schedule 1, RMA

⁸ Clause 29(4), Schedule 1, RMA

- (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, economic, 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, quantify 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) *If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—*
- (a) *the provisions and objectives of the amending proposal; and*
 - (b) *the objectives of the existing proposal to the extent that those objectives—*
 - (i) *are relevant to the objectives of the amending proposal; and*
 - (ii) *would remain if the amending proposal were to take effect.*

The PPC seeks to rezone the land from FUZ to MHU Zone to enable the development of the land for residential purposes, and to establish a Precinct across the PPC land and impose a SMAF control. The PPC also proposes to remove the Historic Heritage Overlay Extent of Place from the PPC land.

To a large extent, the PPC seeks to enable the envisaged use of the PPC land whilst still protecting its key features and acknowledging the existing uses within the surrounding area. The PPC has

incorporated provisions that enable development to occur without significant adverse effects on to the amenity and function of the surrounding area.

The changes relate to the GIS map layer and Chapter I of the AUP, with the new Precinct and zoning being incorporated into the GIS map layer, and the addition of a new precinct into Chapter I referred to as the 'Whenuapai Green Precinct.'

In this context, the '*proposal*' means the nature of the change, being to rezone the land in question from FUZ to MHU Zone, apply the Whenuapai Green Precinct and SMAF control across the PPC land, which includes a range of site-specific provisions for future development, and removal of the Officers' Mess Category B feature extent from the PPC land. The '*objectives*' of the proposal refers to the objectives of the Precinct, which seek to enable development of residential activities on the land, require integration of suitable infrastructure, and ensure mitigation of potential effects. The '*provisions*' refer to the introduction of the proposed Whenuapai Green Precinct provisions i.e., new Precinct plans and site-specific provisions, including new policies, activities, standards, rules, and assessment criteria.

Based on this explanation of the PPC proposal and its objectives, the s 32 analysis requires the following assessment:

- Whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA;
- Whether the provisions (the proposed residential land use and the Green Precinct and SMAF control) are the most appropriate way to achieve the objectives of the PPC;
- Whether the PPC is the most appropriate means to provide for residential growth in this location, considering other possible options and questions of efficiency and effectiveness;
- Evaluation of the costs and benefits of the effects anticipated from the implementation of the PPC, including opportunities for housing and economic growth;
- Quantification of benefits and costs if practicable; and
- Assessment of the risks associated with proceeding or not proceeding with the PPC, if there is uncertain or incomplete information.

The s 32 evaluation relating to the PPC is contained in section 9.0 of this report.

8.4 Nature and Purpose of the PPC

As touched upon in the previous section, under Clause 12 of Schedule 1 of the RMA any person may request a change to a district or regional plan. Clause 22 of Schedule 1 of the RMA outlines that the PPC request must be made to the appropriate local authority in writing and:

- Explain the purpose and reasons for the plan change request;

- Contain an evaluation report prepared in accordance with s 32 of the RMA; and
- The request shall describe any adverse environmental effects, taking into account Clauses 6 and 7 of Schedule 4, in a manner that corresponds to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the proposed change.

The PPC seeks the rezoning of the PPC land from FUZ to MHU Zone (including the Medium Density Residential Standards ('MDRS')) and the establishment of a new Precinct that includes a number of site-specific objectives, policies, activities, standards, and assessment criteria. The proposed zoning is show in **Figure 18** below and provided in **Appendix B**. The proposed overlay plan is provided in **Appendix C**.

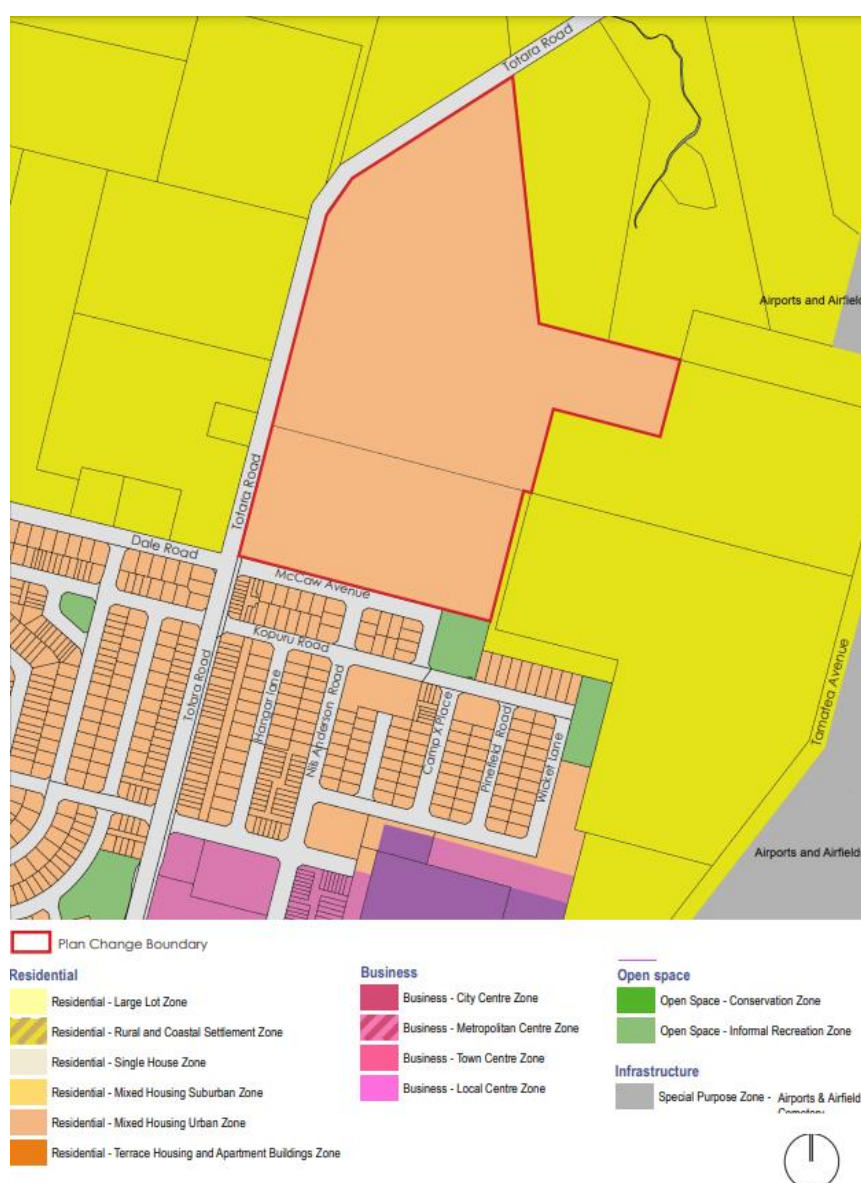


Figure 18 - Proposed zoning of the PPC land

The following outlines the key aspects provided for as part of the PPC:

Transport

- New internal road network
- New intersections on Totara Road, including roundabouts at the northern intersection and the existing Totara Road/Dale Road/McCaw Avenue intersection
- Urbanisation of Totara Road along the PPC land frontage
- Provision of bus stops on Totara Road
- Minor line marking changes to the Brigham Creek Road/Totara Road intersection to enable a shared through/left turn lane for eastbound traffic

Infrastructure

- Site-specific Stormwater Management Plan
- Provision for new wastewater pump station
- Provision of a potable water network

Ecology

- Riparian setbacks
- Enhancement and protection of existing waterways and wetlands
- Riparian planting

It is proposed that the entirety of the PPC land will be subject to a new Precinct, referred to as the Whenuapai Green Precinct, which includes a Precinct Plan and specific precinct provisions to ensure future development on the land is effectively managed and controlled. The proposed Precinct Plans are provided in **Appendix D** and the associated provisions in **Appendix E**. These provisions were developed to consider key features such as:

- Surrounding roading and infrastructure upgrades
- Indicative internal road network
- Separate pedestrian and cycle link
- Retention and enhancement of existing wetlands and watercourses
- Adjoining RNZAF Base Auckland

The proposed precinct provisions include specifications for the staging of infrastructure required to enable the future development of the PPC land.

8.5 PPC Conclusion

Based on the evaluation contained in Section 9.0 of this report, it is considered that the PPC as proposed is the most appropriate means to achieve the purpose of the RMA. It is the best available option to enable and facilitate the use of the land for the envisaged residential uses,

while protecting the environment and the operation of established or future activities in the surrounding area.

9.0 Section 32 Evaluation

9.1 Scope and Purpose

This s 32 evaluation report is prepared to fulfil the statutory requirements of s 32 RMA in respect of the PPC.

The PPC seeks to amend the AUP planning maps contained within the Council’s GIS mapping layer, so that the PPC land is re-identified from FUZ to MHU Zone. It also proposes to introduce a Precinct (referred to as the ‘Whenuapai Green Precinct’) to manage the effects of future development on the PPC land and apply the SMAF control across the land. The PPC seeks to enable the land to be urbanised for residential purposes.

Section 32 RMA requires that before adopting any objective, policy, rule or other method, regard shall be had to the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA, and whether the proposed policies, rules, or other methods are the most appropriate way of achieving the objectives. A report must be prepared summarising the evaluation and giving reasons for the evaluation.

In accordance with s 32(6) RMA and for the purposes of this report:

- the **proposal** means the PPC;
- the **objectives** are the objectives proposed for the PPC Precinct; and
- the **provisions** are the change to the zone of the land and the policies, rules, and other methods of the proposed PPC Precinct and SMAF control that implement or give effect to the objectives of the proposal.

The AUP uses the technique of zoning for achieving the purpose of the RMA and contains a number of established zones to apply to land. The PPC seeks to apply one of these existing zones (MHU Zone) to the PPC land. It also proposes to use bespoke Precinct provisions to manage the effects of future development on the PPC land. Precincts are an established method in the AUP and are often applied to land that is being rezoned for urban purposes. This evaluation report on the PPC relates to the change of zone proposed for the land and the content of the proposed Whenuapai Green Precinct. The zoning sits within the existing policy framework of the AUP which will remain unchanged, while the Precinct proposes to introduce some new objectives and policies that will solely apply to the PPC land.

This s 32 evaluation will continue to be refined in relation to any consultation that occurs, and in relation to any new information or changes that may arise, including through submissions and during the hearing. This approach of further evaluation is anticipated under the requirements of s 32AA RMA.

We consider that s 32(3) and (4) are not relevant as this proposal is for a new plan change, as opposed to amending an existing statutory document. As per s 32(4)(a), a summary of the consultation undertaken for the PPC is provided in Section 13 of this report and responses to the received advice are referenced throughout this report.

9.2 Evaluation of the Objectives

Section 32(1)(a) RMA requires that the objectives of the proposal are evaluated to ascertain whether they are the most appropriate way to achieve the purpose of the Act.

The purpose of the RMA is “to promote the sustainable management of natural and physical resources.”⁹ “Sustainable management” means “managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.”¹⁰*

The objectives of the PPC are as follows:

General

- (1) *Subdivision, use and development in the Whenuapai Green Precinct is undertaken in a comprehensive and integrated way to provide for residential living while recognising the ongoing operation and strategic importance of the RNZAF Base Auckland.*
- (2) *Subdivision, use and development achieves a well-connected, safe and healthy environment for living and working with an emphasis on the public realm including parks, roads, walkways and the natural environment.*
- (3) *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.*
- (4) *A relevant residential zone provides for a variety of housing types and sizes that respond to -*

⁹ RMA, s5(1)

¹⁰ RMA, s5(2)

- (a) Housing needs and demand; and*
- (b) The neighbourhood’s planned urban built character, including three-storey buildings*

Integration of Subdivision and Development with the Provision of Infrastructure

- (5) Subdivision and development does not occur in advance of the availability of operational transport infrastructure.*

Transport

- (6) Subdivision and development provides for the safe and efficient operation of the current and future transport network for all modes.*

- (7) Transport infrastructure that is required to service subdivision and development within the Precinct:*
 - a) Provides for safe and efficient walking and cycling connections within the precinct*
 - b) Provides for bus stops to support future improvements to public transport connectivity*
 - c) Mitigates traffic impacts on the surrounding road network*
 - d) Provides safe and efficient low speed internal streets*
 - e) Provides connectivity to facilitate future subdivision and development of adjacent sites; and*
 - f) Is integrated with the external road network and co-ordinated with subdivision and development*

- (8) Roading connections, new or upgraded intersections, upgrading of Totara Road and minor line marking changes to Brigham Creek Road/Totara Road intersection are provided to support subdivision and development within the Precinct.*

Ecology

- (9) The health and well-being of streams and wetlands within the Precinct is enhanced.*

- (10) Riparian planting contributes to increasing the canopy cover within the Precinct.*

Three Waters Infrastructure

- (11) All necessary three waters infrastructure (being water supply, wastewater, and stormwater infrastructure) is in place to service development within the Precinct and is staged and co-ordinated with subdivision and development.*

- (12) Stormwater quality and quantity is managed to maintain the health, well-being, and preserve the mauri, of the receiving environment, and minimise flood risk.*

(13) Stormwater devices avoid or otherwise minimise or mitigate adverse effects on the receiving environment, and the attraction of birds that could become a hazard to aircraft operations at RNZAF Base Auckland.

Effects on RNZAF Base Auckland

(14) The effects of subdivision, use and development on the operation and activities of RNZAF Base Auckland are avoided as far as practicable, or otherwise remedied or mitigated.

(15) The adverse effects of aircraft engine testing noise on activities sensitive to aircraft noise are avoided, remedied, or mitigated at the receiving environment.

Open Space

(16) A network of attractive, safe and functionally distinct open space areas comprising a neighbourhood reserve and drainage reserves, which enhance the amenity, ecological values and recreational opportunities within the precinct and of Whenuapai Village.

The objectives seek a range of outcomes, including the delivery of a comprehensively developed residential environment that will expand the Whenuapai centre by providing additional land for housing. The PPC will achieve medium density residential activities that are supported by the Whenuapai Township and surrounding employment and commercial centres. Other outcomes include the provision of appropriate transport infrastructure to support future residential development, protection and enhancement of streams and natural wetlands, and protection of the operation and function of nationally significant infrastructure.

These objectives are considered to be the most appropriate way to achieve the sustainable management purpose of the RMA for the following reasons:

- The objectives seek that future residential use, subdivision and development is enabled on the land. The land has been earmarked for residential development for a considerable period of time and is in an optimal location in relation to key transport links, employment and commercial hubs and other established residential areas that contain a range of recreational and community facilities. The provision of more residential land in this area will enable people and the community to provide for their economic and social wellbeing.
- The objectives seek that the PPC land be served and integrated with the appropriate transport infrastructure. This will enable active modes and public transport to be integrated with future development, whilst also contributing to environmental benefits in relation to mitigation of climate change effects by reducing the dependence on private vehicles over time. Furthermore, the objectives avoid a significant economic

burden being placed on the wider community in the future, as transport infrastructure is required to be provided or existing infrastructure upgraded as part of the PPC.

- The objectives seek to protect and enhance streams, wetlands, and riparian areas, with a multitude of benefits arising in relation to improved water quality, improved biodiversity, and mitigation of natural hazards. Implementation of the PPC will significantly improve the ecological habitats from their current state. These outcomes contribute to sustaining natural resources, safeguarding the life-supporting capacity of water and ecosystems, provide for cultural wellbeing, and mitigate adverse effects on the environment.
- The objectives seek to ensure that nationally significant infrastructure is protected and directly refers to the RNZAF Base Auckland to ensure its ongoing operation and function is appropriately managed and provided for as part of the PPC. These outcomes protect physical resources that contribute to the wider community's social, economic, and cultural wellbeing, and health and safety.

There are no additional objectives that would be required to achieve the purpose of the Act, or alternative objectives that are more appropriate than those contained within the PPC Precinct.

Overall, it is considered that the proposal, being to rezone the PPC land for residential uses, provides for the social, economic and cultural well-being of the community by increasing the supply of housing in an optimal location within the Auckland region whilst avoiding, remedying and mitigating any adverse effects on the environment.

9.3 Development of Options

In addition to consideration of the extent to which the objectives of the PPC are the most appropriate way to achieve the purpose of the RMA, s 32 requires an examination of whether the provisions in the PPC are the most appropriate way to achieve its objectives by identifying other reasonably practical options for achieving the objectives. In the preparation of the PPC, the following options have been identified:

- **Option 1** – do nothing/retain the status quo
- **Option 2** – reidentify as MHU zone
- **Option 3** – reidentify as MHU zone, with a Precinct and SMAF control
- **Option 4** – same provisions as option 3, but applied to a smaller or larger area of land

The selected options are not an exhaustive list, as there is little value in identifying unrealistic options simply to then discount them. There are no identified land use options other than residential as all higher order documents (such as the WSP) envisage the land being used for residential purposes.

9.4 Evaluation of Options

In accordance with s 32(1)(b) and 32(2) of the RMA, the options have been assessed on their efficiency, effectiveness, costs, benefits, and risks. Within this evaluation, the following meanings have been assigned to the evaluative criteria:

- The concept of **efficiency** considers whether the provisions achieve the objectives at the lowest total cost or with the highest net benefit. It is assessed in the context of costs and benefits that arise for the whole of society.
- **Effectiveness** can be measured by the contribution that the provisions make towards achieving the objectives of the proposal.
- A **cost** is a negative effect that is imposed on society to achieve some level of benefit.
- **Benefits** are positive effects that arise.
- **Risk** is considered in the context of costs and benefits and is the prospect of unanticipated costs arising or potential benefits failing to materialise.¹¹

The results of this s 32 evaluation are discussed in this section. There are no realistic non-regulatory methods that could deliver the outcome sought by the PPC.

In considering the efficiency and effectiveness of the provisions, reliance has also been placed on existing AUP rules and standards where they play a role in achieving the objectives. New Precinct provisions are not proposed where they would simply duplicate existing operative provisions of the AUP. Existing rules, standards, or other regulations that have been relied upon to support the conclusions in this s 32 evaluation include:

- Aircraft Noise Overlay (Chapter D24)
- Stormwater management (Chapter E1)
- Stream works (Chapter E3)
- Earthworks (Chapter E11/12)
- Vegetation management (Chapter E15)
- Transport (Chapter E27)
- Natural hazards (Chapter E36)
- Subdivision (Chapter E38)
- Development standards (Chapter H5)
- Ministry of Defence Designations 4311 (Chapter K)

The existing AUP provisions are effective and efficient in achieving the objectives of the proposal, and consequently do not need to be replaced or amended. As they are existing, there

¹¹ Adapted from 'A guide to section 32 of the Resource Management Act: Incorporating changes as a result of the Resource Legislation Amendment Act 2017.' Ministry for the Environment, 2017.

are no significant costs incurred through retaining them and they give rise to benefits relating to stream health, traffic safety, and managing potential reverse sensitivity effects.

Option 1 – Adopt a ‘do nothing’ approach/retain the status quo

The ‘do nothing’ option would mean that the zoning of the land would remain unchanged, being FUZ land. Whilst this option does not foreclose urban development, it does defer it to a later date as the land is required to be ‘live-zoned’ in order for development to occur.

Under the FDS, development is not scheduled to occur on the PPC land before 2035. However, there is an existing housing shortage in the region, particularly in respect of affordable housing. It is considered that the current FUZ does not encourage productive use of the land and the transitional nature of the zone has left the site in a somewhat neglected and unproductive state.

Option 1 is not **effective** in achieving the objectives because nothing will change. It does not enable residential development nor provides for the range of environmental enhancements and protection outcomes that is sought by the Precinct objectives for the land.

Option 1 cannot be an **efficient** way of achieving the objectives if it does not achieve them at all. Retaining the PPC land as FUZ will maintain its relatively degraded and neglected state, with minimal productive use for rural purposes due to its inevitable urbanisation. The lack of private investment will only worsen the state of the land and entrench its ‘urban limbo.’ Option 1 does not enable an efficient use of land that is predominantly unconstrained, is relatively flat and is well located in respect of transport options, employment, and commercial hubs. It also does not recognise or efficiently utilise the significant public investment in infrastructure that has occurred in Whenuapai and the wider north-west area, such as establishment of bulk wastewater and water services, roading upgrades, and purchasing land for public use.

Retention of the status quo does not impose any direct **cost** on the community, but it does impose opportunity costs.

Failure to utilise the opportunities presented by the land for housing in an optimal location gives rise to opportunity costs. Under this option, people will be restricted to the existing housing stock within the area, whereas access to housing in an optimal location would be an outcome if the land were rezoned for residential purposes. In addition, the status quo would not provide housing within close proximity to existing commercial and employment areas, that would reduce commuter travel times and social costs as reduced commuting time enables workers to spend more time with their families and community.

There is also an economic cost in not utilising the boost to the economy that would arise through construction, or the presence of people in an area within close proximity to employment and commercial centres that will contribute to both the local and wider Auckland economy. If the

PPC does not proceed, these benefits will be lost to the local economy, and the land will remain underutilised.

The need for affordable housing in accessible locations that foster a sense of community and provide access to employment and everyday needs is acknowledged in the FDS, which states:

“People feel part of strong, connected, sustainable communities where they can easily meet the full range of their needs for housing, employment, recreation, health and well-being.”

Retention of the streams and natural wetlands in their current degraded and neglected form imposes an environmental opportunity cost if the PPC does not proceed, as it proposes to enhance these features via weed removal, water quality treatment and extensive planting of native species.

There are no clear **benefits** associated with Option 1. The PPC land is not used for any significant level of primary production, highlighting that the retention of the land in its current semi-rural state will have no appreciable benefit in terms of food production or other production uses. Maintaining the status quo enables the existing dwellings on the PPC land to remain and used for residential accommodation, however, is only considered a minor benefit of Option 1 when considering what could be achieved if the PPC were to proceed.

Overall, Option 1 would give rise to several costs and deliver no significant benefits, in addition to not achieving the objectives.

Option 2 – re-identify as Residential – Mixed Housing Urban Zone

This option would change the zoning of the land from FUZ to MHU zone and would enable 16.35 ha of developable land to be urbanised for residential purposes.

Option 2 is **effective** in part as it enables the land to be urbanised and developed for residential purposes in accordance with existing rules in the AUP. The MHU zone is also consistent with the level of density sought under the WSP for the land.

However, it *may not* be effective in achieving some of the objectives. For example, the objectives seeking that infrastructure upgrades and enhancements of streams and natural wetlands be provided may not be achievable as there are no existing provisions of the AUP that directly require those outcomes to occur on the PPC land. It is likely that these matters would be subject to discussions and negotiations in how these objectives should be achieved at the future resource consent stage, rather than at the PPC stage. In addition, Option 2 *will not* be effective in achieving other objectives, such as those seeking to manage the interface and any reverse sensitivity effects on to the adjoining RNZAF Base Auckland. Without the new PPC provisions

seeking to protect the ongoing operation and function of the Base, there is no existing policy or rule framework in the AUP that can achieve that outcome.

Option 2 will provide for the PPC land to be used for residential purposes in an *efficient* way because it does rezone the land. However, without the implementation of any mechanism to achieve the objectives of the PPC, it is likely that any success in achieving these objectives would need to be negotiated through the processing of any future resource consent applications and as a result, may create uncertainty and inconsistencies in how the objectives should be achieved. That does not provide an efficient means of achieving the full range of PPC objectives.

There are *costs* associated with Option 2 because it will not be able to fully manage all the effects that are anticipated to arise from urbanisation of the PPC land.

A financial cost on the wider community could potentially arise if transport infrastructure is not upgraded sufficiently to mitigate the effects of urbanising the PPC land. Any shortfall in the funding and timing of infrastructure to meet the needs of the PPC land would then fall on the community in the future through rates or other financial mechanisms. In addition, there would also be opportunity costs on the environment as there would be no mechanism under the existing AUP for the enhancement of streams and natural wetlands under Option 2. The potential for greater reverse sensitivity effects also arises in regard to the ongoing function and operation of the RNZAF Base Auckland if the appropriate provisions are not in place, which would be the case under the existing MHU zone provisions. Constraints on the efficient operation of the RNZAF Base Auckland would effectively be a cost to the wider community, given that this strategic facility fulfils a regionally and nationally significant function.

Option 2 delivers economic *benefits* in relation to the provision of residential land in an area within close proximity to commercial and employment centres. It is also considered that the rezoning of the land has benefits for the landowner insofar as it reduces financial obligations that would otherwise arise to achieve some of the objectives (such as infrastructure upgrading), but these benefits come at an equivalent cost to the community or the environment.

Option 2 would achieve some, but not all, of the PPC objectives. It would have benefits arising from the provision of more residential land. However, there are also several significant and avoidable costs that would arise in obtaining those benefits as Option 2 does not include any mechanism for managing the effects associated with future development of the PPC land other than relying on the existing provisions of the AUP for that purpose. Therefore, Option 2 is not the preferred option for the identified reasons.

Option 3 – re-identify as Residential – Mixed Housing Urban Zone with a precinct, SMAF control and removal of the Historic Heritage Overlay

This option would change the zoning of the land from FUZ to MHU zone. Similar to the previous option, Option 3 provides for approximately 16.35 ha of developable land to be urbanised for residential purposes. The key difference between the options is the proposed Precinct and SMAF control over the PPC land to manage effects could not be effectively managed through the existing AUP provisions, and the removal of the portion of the Historic Heritage Overlay that is located on the PPC land.

Option 3 is **effective** because it delivers more residential land while also providing means to achieve the other objectives of the PPC. The range of standards and rules that would be introduced through the Precinct and SMAF control will enable each of the objectives to be appropriately addressed. The removal of the small portion of the Historic Heritage Overlay (related to the RNZAF Base Auckland Officers' Mess) on the PPC land will not affect the protection afforded by the overlay but will enable the objectives of the Precinct to be appropriately addressed.

The option is more **efficient** than the available alternatives because it provides a mechanism and clear policy framework for the achievement of the objectives, without having to solely rely on negotiations and discussions in relation to any future resource consent applications that may be required for development on the PPC land.

There are no appreciable **costs** for the community that are associated with Option 3, as all effects would be appropriately managed through the amended AUP provisions that the PPC seeks to introduce. There may be increased costs for the landowner as a result of additional obligations imposed under the Precinct provisions (such as funding infrastructure upgrading, stream enhancement, loss of otherwise developable land, and so on), but these are outweighed by the costs that would arise to the community if there was no means to achieve some of the PPC objectives.

Option 3 generates a broad range of **benefits**. It will stimulate both the local and (in part) the wider Auckland economy through the provision of housing that will require a range of construction and land development jobs and therefore provide significant employment opportunities through the future development enabled by the PPC. The provision of residential land will bring more people to the area which is located within close proximity to existing employment and commercial centres, whilst also encouraging further growth of these centres through the increase in population via future housing on the PPC land. In addition, the PPC will enable residential land in an area that has been earmarked for residential development for a considerable amount of time. Option 3 facilitates the funding and establishment of the necessary infrastructure and provides for the enhancement of streams and natural wetlands on

the PPC land. The interface between the PPC land and the RNZAF Base Auckland would also be appropriately managed via the Precinct provisions.

Therefore, Option 3 is the preferred option for the reasons outlined above and forms the basis of the PPC.

Option 4 – same provisions as option 3, but applied to a smaller or larger area of land

This option includes the same Precinct provisions, SMAF control and removal of the Historic Heritage Overlay as Option 3 but considers whether the change from FUZ to MHU zone should be applied over either a smaller or larger area. Effectively, this option is focused on the geographic extent of the PPC and evaluates whether the proposed zone boundaries are in the most appropriate location to achieve the PPC objectives.

Any rezoning to MHU zone in Whenuapai would contribute to increasing the supply of housing and is consistent with the eventual outcomes sought for the land in this part of Auckland. Evidently, a greater area of rezoned land would make a larger contribution, and a smaller area would make a correspondingly lesser impact. The spatial extent of the PPC land does not significantly alter the *effectiveness* of the PPC in achieving its objective of providing for more residential land in an integrated manner, other than acknowledging that more land is evidently better.

The PPC will be *efficient* in its ability to achieve the objectives, irrespective of the area of land that will be rezoned, because the proposal includes both a rezoning and the introduction of a Precinct and SMAF control. The PPC applies to all the land within its boundary, which is more efficient than a PPC area that excludes specific areas or individual lots within a wider area of rezoning. Exclusion of specific areas or individual parcels of land would require additional plan changes for isolated areas of land, which is considered an inefficient way of transitioning FUZ land to the appropriate urban zone compared to a more cohesive land area.

Regarding the administrative *costs* of the PPC process, there will inevitably be some economies of scale with a larger plan change area. The costs incurred to bring the PPC to an operative status will be similar whether the PPC area is smaller or larger because many of the costs are not related to the size of the land. There are no other notable costs that are related to the area of land that is to be rezoned.

The *benefits* of a smaller or larger PPC area need to be considered in the context of the specific location of boundaries and the nature of the surrounding environment. The PPC boundaries have been selected to achieve a cohesive and logical area for residential rezoning and results in the entirety of the PPC land being under the control of the applicant.

At the southern end of the PPC land, the area has already been rezoned and housing developed. Whilst the land directly to the east and north-east is either owned by private landowners or owned and operated by the NZDF and is anticipated to be retained as part of its operations, thereby forming a logical eastern boundary for the PPC area. Totara Road forms the western and north-western boundaries of the PPC area and is considered to provide a logical boundary for the PPC land.

Overall, the boundaries of the PPC area are appropriate and logical and there is no compelling reason to amend them to create a smaller or larger area of MHU zone land.

9.5 Risk of Acting or Not Acting

Section 32(2)(c) RMA requires this evaluation to assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. It is considered that there is sufficient information about the proposed rezoning to MHU zone (with a Precinct and SMAF control) to proceed with the PPC. The change from FUZ to MHU zone, the removal of the Historic Heritage Overlay, and the introduction of a Precinct and SMAF control, is neither unclear nor uncertain. This s 32 evaluation will continue to be refined in relation to any new information that may arise following notification, including during hearings.

9.6 Overall Conclusions of s 32 Evaluation

The evaluation of options undertaken in this report demonstrates that the preferred option for meeting the objectives of the PPC is a plan change to the AUP to rezone the PPC land to MHU zone and apply a Precinct and SMAF control to manage future development (referred to in this s 32 evaluation as Option 3).

The proposed reidentification to MHU zone is consistent with, and gives effect to, the direction established by the WSP. In accordance with s 32(1)(a), the objectives in the PPC Precinct are the most appropriate way to achieve the purpose of the RMA and rezoning the land for residential purposes (with a Precinct and SMAF control) is the most efficient and effective means of achieving the objectives of the proposal.

10.0 Resource Management Framework

10.1 Introduction

The strategic framework for the assessment of a proposed plan change comprises both RMA and non-RMA documents. While the primary document to be considered is the AUP, the Auckland Plan (given effect to by the AUP) and the NPSUD (which is also to be given effect by the AUP) are also relevant documents.

10.2 Part 2 of the RMA

The purpose of the RMA is to promote the sustainable management of natural and physical resources, as defined in s 5(2) of the Act.

The purpose of the RMA is set out in s 5 as follows:

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*
 - (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) Safeguarding the life supporting capacity of air, water, soil, and ecosystems; and*
 - (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Part 2 matters relevant to the PPC include:

- enabling people and communities to provide for their social, economic, and cultural well-being (s 5(2));
- sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations (s 5(2)(a));
- safeguarding the life-supporting capacity of air, water, soil, and ecosystems (s 5(2)(b));
- avoiding, remedying, or mitigating any adverse effects of activities on the environment (s 5(2)(c));

- the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development (s 6(a));
- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga (s 6(e));
- kaitiakitanga (s 7(a));
- the efficient use and development of natural and physical resources (s 7(b));
- the efficiency of the end use of energy (s 7(ba));
- the maintenance and enhancement of amenity values (s 7(c)); and
- the effects of climate change (s 7(i)).

The PPC is considered to be aligned with Part 2 of the RMA as it seeks to provide for the social and economic well-being of the community in a way that mitigates adverse environmental effects, maintains amenity values, and uses land efficiently.

It is considered that the PPC will promote sustainable management as it encourages the integration of land use and transport infrastructure, whilst enabling residential activities to occur that will greatly contribute to housing supply, choice, and variety in a location earmarked for residential growth, while avoiding or sufficiently mitigating adverse effects on to the environment.

Section 6 lists a number of “Matters of National Importance.” In respect of these matters, the proposal will contribute to the preservation of natural features (wetlands and streams) and increase native vegetation, and it will recognise the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga (s 6(e)).

In terms of “Other Matters” listed in s 7, it is considered that paragraphs 7(a), (b), (ba), (c) and (i) are of particular relevance to the PPC. The PPC enables the envisaged use of the PPC land to be realised and increases the potential for the land resource to be efficiently used for development.

The provisions applying to the Whenuapai Green Precinct will ensure that appropriate activities are established and managed, natural features protected, the use of public transport encouraged, and provides for cycling and walking facilities via the transport links and provisions proposed.

The proposed precinct provisions introduced with the PPC will ensure that the amenity values of the PPC land and the surrounding environment will be maintained. The proximity of the PPC land to the Whenuapai Township, key transport links and surrounding commercial areas, as well as community and recreation facilities, will support future residents by providing access to everyday services and amenities within a defined area, thereby combating the effects of climate change through minimising commuting and everyday travel distances.

In relation to s 8, there are no known Treaty issues with the PPC land, although the role of Mana Whenua throughout the PPC and future development process is acknowledged. The applicant is committed to an ongoing partnership with Mana Whenua who hold an interest in the area and will continue to be in open dialogue for the entirety of the PPC process and beyond. Please refer to the Consultation Summary in **Appendix F** for details.

Overall, the PPC will assist in achieving the purpose of the RMA. The PPC will promote sustainable development, will positively impact the social and economic wellbeing of the people and communities of Auckland, and any effects on the environment will be appropriately managed. Accordingly, the PPC will achieve the purpose and principles of the RMA.

10.3 Other Relevant Sections of the RMA

Section 31(1)(a) of the RMA states that a function of the Council is “*the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district*”. It is considered that the PPC assists the Council to carry out its functions as set out in s 31.

Section 31(1)(aa) is of particular relevance to the PPC in that it states that a function of territorial authorities is also:

“the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”.¹²

The PPC assists in fulfilling this function as it provides for additional residential land to meet the high demands of the Auckland region for residential land in strategic locations that is suitable for a range of housing types, particularly medium-density housing.

Section 75(3) of the RMA sets out the matters to be given effect to by a district plan:

- any national policy statement;
- any New Zealand coastal policy statement;
- a national planning standard; and
- any regional policy statement.

It is also noted that a territorial authority must not have regard to trade competition or the effects of trade competition in preparing or changing its district plan (s 74(3)).

¹² Section 31(1)(aa) was inserted into the RMA in 2017

The PPC would have legal effect only once it is operative, as it is a privately initiated plan change.

10.4 National Policy Statements

National Policy Statements ('NPS') are instruments issued under s 52(2) of the RMA and state objectives and policies for matters of national significance. There are currently eight national policy statements in place:

- National Policy Statement for Freshwater Management
- National Policy Statement for Renewable Electricity Generation
- National Policy Statement on Electricity Transmission
- New Zealand Coastal Policy Statement
- National Policy Statement for Highly Productive Land
- National Policy Statement on Urban Development
- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat
- National Policy Statement for Indigenous Biodiversity

Of these, the NPSUD and the NPS on Freshwater Management, Indigenous Biodiversity, and the New Zealand Coastal Policy Statement are considered relevant to the PPC.

10.4.1 National Policy Statement on Urban Development 2020 (Updated May 2022)

The NPSUD is designed to improve the responsiveness and competitiveness of land and development markets. In particular, it requires local authorities (of which Auckland is recognised as a 'Tier 1' authority) to provide sufficient development capacity, so more residential land can be provided to meet the high demand. The NPSUD provides direction to ensure capacity is provided in key, strategic locations, that enables homes to be built in response to demand. The NPSUD provides direction to ensure capacity is provided in accessible places, helping New Zealanders build homes and create communities in optimal locations within close proximity to jobs, community services, transport links and other amenities to support well-functioning neighbourhoods.

The NPSUD replaces the National Policy Statement on Urban Development Capacity 2016 ('NPS-UDC') but maintains and builds upon some of its policies. Several policies are more directive than those in the NPS-UDC, particularly in New Zealand's fastest growing environments such as Auckland. The NPS-UD is also intended to improve the responsiveness and competitiveness of land and development markets.

The PPC accords with many of the objectives and policies of the NPSUD, as it seeks to provide additional land supply for residential growth, in an area close to a labour force, serviced by existing or planned public transport, and in a location that has been earmarked for residential

growth for over 20 years. Particular objectives and policies that are relevant to the PPC are noted below:

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Objective 4: *New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

Objective 6: *Local authority decisions on urban development that affect urban environments are:*

- (a) integrated with infrastructure planning and funding decisions; and*
- (b) strategic over the medium term and long term; and*
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (a) that are close to transport links, housing, public transport, and other amenities*
 - (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*
-*
- (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.*

Policy 2: *Tier 1, 2, and 3 local authorities, at all times, 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.*

Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*

- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) are not, of themselves, an adverse effect**
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
- (e) the likely current and future effects of climate change.*

Policy 8: *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*

- (a) unanticipated by RMA planning documents;*
- (b) or out-of-sequence with planned land release.*

Overall, the PPC is considered to be consistent with the NPSUD and gives effect to the aspirations and directive policies as follows:

- The proposed rezoning of the PPC land from FUZ to MHU zone will enable the anticipated growth of Whenuapai and provides for residential land in an optimal location close to key transport connections, and the wider Auckland region.
- The PPC land is located adjacent to existing residential land and is within close proximity of the Whenuapai town centre which contains everyday amenities that support the wellbeing and function of residential communities. The type and form of housing that will be enabled by the PPC will not be a notable shift for the surrounding area due to the existing medium density housing to the south of the PPC land, which is also zoned MHU zone.
- The proposed MHU zone will enable much needed housing supply in a location that is well suited in relation to existing and future employment centres, such as the nearby Whenuapai, Hobsonville and Westgate employment areas.
- The PPC includes significant upgrades to existing infrastructure and the provision of new infrastructure to ensure any future development is seamlessly integrated with the existing surrounding area and future development to ensure a well-functioning urban environment is achieved.

- The PPC land is currently zoned FUZ, which anticipates that development and subsequent urbanisation will occur. The MHU zoning proposed by the PPC is entirely consistent with the WSP and the long-term vision for the PPC land, which anticipates the land to be used for medium density housing. Whilst it is noted that the proposed zoning of the PPC land will alter the existing amenity values of the land, the FUZ that applies to the land in combination with the surrounding medium-density residential development that has already been undertaken, shows that the shift away from a semi-rural environment has already begun. The PPC is a continuation of this anticipated change as envisaged by key planning documents, such as the FDS and WSP.
- Whilst it is acknowledged that the PPC is slightly ahead of the sequencing outlined in the FDS, the NPS-UD provides a pathway for out-of-sequence development to occur if it would significantly add to development capacity and contribute to a well-functioning urban environment. The PPC is considered to achieve this by providing for considerable infrastructure upgrades, a residential zoning consistent with higher order policy documents, such as the WSP and is located in area that is well connected and located in regard to employment centres and the wider Auckland region.

10.4.2 The National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 provides direction as to how local authorities should carry out their responsibilities under the RMA for managing freshwater quality. It directs that councils set objectives, limits, and methods to achieve the objectives/requirements that are set out in the National Policy Statement for Freshwater Management and includes objectives relating to water quality and the health and safety of people, communities, water quantity, integrated management of water and the use and development of land in whole catchments and the efficient use of water. It is considered that the proposal will not be contrary to the outcomes sought by the National Policy Statement for Freshwater Management (as outlined in the ecological assessment in **Appendix A** and elsewhere in this report).

10.4.3 The National Policy Statement for Indigenous Biodiversity

The National Policy Statement on Indigenous Biodiversity provides direction as to how local authorities should carry out their responsibilities under the RMA for the protection of indigenous biodiversity. It sets out objectives, policies, and implementation requirements to maintain and enhance indigenous biodiversity across all land types. It directs councils to update their policies, plans, and strategies to reflect the requirements, such as the establishment of Significant Natural Areas. It is considered that the proposal will not be contrary to the outcomes sought by the National Policy Statement on Indigenous Biodiversity (as outlined the ecological assessment in **Appendix A**).

10.4.4 New Zealand Coastal Policy Statement

Whilst the PPC land is not directly within a coastal area, the permanent and intermittent streams identified towards the eastern portion of the PPC land forms, flows into the Rarawaru Creek and on to the Waitematā Harbour. Therefore, for completeness, we note that the New Zealand Coastal Policy Statement recognises the impact of inland activities on the coast and sets out a range of objectives and policies to protect New Zealand’s coastal environment. It is considered that, due to the PPC land’s location in relation to the coast, the natural character of the coastal environment will not be impacted. In addition, the PPC incorporates a range of provisions relating to stormwater management to ensure adverse stormwater effects on the existing stream network are appropriately managed and mitigated. Overall, the PPC is not contrary to the New Zealand Coastal Policy Statement.

10.5 National Environmental Standards

National Environment Standards are regulations that prescribe standards for environmental matters. There are six National Environmental Standards in force as regulations, but none of these are relevant to the PPC. In respect to contamination, any contamination previously identified has been identified and the appropriate measures proposed/undertaken (refer to the Site Investigation Reports in **Appendix G** for further details). Land within the PPC area that may be contaminated (but has not yet been identified) will be remediated as future development occurs and will be assessed as part of future resource consent applications. On this basis, no further regard needs to be given to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health or matters of soil contamination relating to the PPC land.

10.6 National Planning Standards

The purpose of the National Planning Standards is to improve consistency in plan and policy statement, structure, format, and content so they are easier to prepare, understand, compare, and comply with. The Standards will also support implementation of national policy statements and help people observe the procedural principles of the RMA.

The first set of Standards have been introduced and were confirmed in April 2019.

There is a significant period of time after confirmation of the Standards (10 years) before Auckland Council is required to modify its planning documents. Furthermore, there will be many other zoning situations in the AUP that are substantially similar to that enabled by the PPC and those would also be subject to any amendments that may arise as a result of implementing the Standards. For these reasons, it is considered that the Standards will have no effect on the development of the PPC at the current time.

10.7 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (the ‘Act’) requires territorial authorities in New Zealand’s largest urban centres to set more permissive land use regulations to enable greater intensification. The Act encourages changes to be made to the NPSUD to remove inconsistencies and clarify the relationship between the NPSUD and the Act.

The Act introduced a modified plan making process called the Intensification Streamlined Planning Process and the MDRS in all tier 1 urban environments, which includes Auckland. The MDRS enables medium-density housing to be built as of right (3 dwellings of up to 3 storeys per site) across more urban areas in New Zealand.

Due to the changes proposed under the Act, Auckland Council is required to apply the MDRS to all existing residential areas (excluding the large lot zone) or areas where qualifying matters apply. Land in tier 1 urban environments that are proposed to be rezoned as a relevant residential zone (e.g. greenfield development) will also be required to apply the MDRS and therefore, the PPC will include the MDRS.

It is considered that the PPC aligns with the outcomes of the Act and will provide for additional housing on land identified for this purpose for the last two decades. The PPC is consistent with the WSP and provides for the necessary infrastructure to enable development to occur ahead of the timing identified in the FDS. Therefore, it is considered that the delivery of land in this manner is highly anticipated and consistent with the Act by enabling a variety of housing typologies and choice in an optimal location.

10.8 The Auckland Plan (2018 version)

The Auckland Plan 2050 is a long term spatial plan for the growth of Auckland over the next 30 years to ensure Auckland grows in a way that will meet the opportunities and challenges of the future. The recently adopted FDS replaces the 2018 Development Strategy Contained within the Auckland Plan and the FULSS. While the FDS is discussed in further detail in the following section, the Auckland Plan outlines a number of key outcomes and aspirations that are broadly relevant and applicable to the PPC. It is considered that the PPC is consistent with many of these outcomes and will contribute to Auckland’s social, economic, environmental, and cultural wellbeing.

One of the key outcomes of the A Auckland Plan is to provide Auckland with secure, healthy, and affordable homes that have access to a range of public places. The Auckland Plan also seeks to accelerate the construction of homes that meet the changing needs and preferences of households and create more housing choice. The PPC will enable otherwise underutilised land

to directly contribute to the supply of housing and enables the delivery of new modern homes of varying forms and sizes to respond to the everchanging needs and configurations of household structures. In addition, the PPC land is located within close proximity to a range of public space, such as public parks and playgrounds within the Whenuapai town centre, and recreation reserves along the nearby coastline.

Another key outcome of the Auckland Plan is to provide sufficient transport and access for Aucklanders by better connecting people, places, goods, and services, whilst also increasing travel choice. The PPC land is located within close proximity to everyday services located within the Whenuapai town centre, a short walk away, in addition to larger centres, such as Hobsonville and Westgate, being within a short drive or bus ride. These larger centres also provide for a wider range of public transport options, such as the Western Express bus service which provides a direct connection to the CBD every 10 to 15 minutes during peak hours. The PPC land is also within close proximity to State Highways 16 and 18. Furthermore, a range of upgrades to existing transport infrastructure and the provision of new transport infrastructure is proposed as part of the PPC to support a more efficient transport network and provide greater choice for future residents.

The Auckland Plan also aims to protect and preserve the natural environment and encourages growth to protect and enhance Auckland’s natural environment. The PPC achieves this by protecting the identified streams, wetland, and riparian areas on the land, as well as enhancing these areas through a range of native planting.

It is therefore considered that the PPC is consistent with the Auckland Plan as it will enable the provision of high-quality housing in an area anticipated to be used for residential purposes that is within close proximity of public space and amenities.

10.9 Future Development Strategy 2023

As discussed above, the FULSS and the future development strategy contained within the Auckland Plan have been superseded by the FDS. The FDS focuses on the long term future of Auckland and how growth should be managed for the next 30 years to ensure sufficient residential land is provided. The Auckland Plan and the FDS work in tandem to set the high-level direction for Auckland over the long-term.

Under the FDS, the PPC land is located within ‘Whenuapai North (Stage 1)’ and is identified as being live zoned not before 2035+. Whilst it is acknowledged that the PPC will be ahead of the identified timing, the FDS does provide a pathway for out-of-sequence development to occur.

Another key aspect of the FDS is the provision of infrastructure pre-requisites to support the development and growth of future urban areas. The Whenuapai North (Stage 1) pre-requisites are outlined by the below figure. It is noted that the Whenuapai North Stage 1 and 2 have

identical infrastructure pre-requisites, with the sole difference being Stage 1 identified as development ready from 2035+ and Stage 2 from 2050+.

Whenuapai North (stage 1)	Not before 2035+	SH16 to SH18 Connections Brigham Creek Road upgrade Northwest Rapid Transit Upper Harbour (SH18) Rapid Transit Whenuapai Wastewater Package 1 Whenuapai Wastewater Package 2 Trig Road Water Reservoir, North Harbour No.2 Watermain Project
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Figure 19 - Infrastructure pre-requisites for the PPC land

The following is noted in regard to the infrastructure pre-requisites for the PPC land:

- As outlined in Abley’s transport assessment provided in **Appendix H**, the Brigham Creek Road/Totara Road and SH18/Brigham Creek Road intersections have sufficient capacity to support the PPC, without the need for the identified SH16 to SH18 connections.
- Abley has identified that the existing Brigham Creek Road/Totara Road intersection has sufficient capacity to support the PPC. It is anticipated that Brigham Creek Road will be progressively upgraded as future development fronting the road corridor progresses in the future.
- Whilst Abley’s assessment found that the existing public transport network in Whenuapai does not meet Auckland Transport’s classification for Frequent or Rapid Transport and is currently at the community engagement stage, their assessment demonstrates that Brigham Creek/Totara Road and SH18/Brigham Creek Road intersections have sufficient capacity to support the PPC, prior to Auckland Transport’s provision of Frequent and Rapid Transit for Whenuapai. It is also noted that there are viable public transport options in Whenuapai that provide connections to the wider public transport network, including the Western Express service which provides regular buses directly to the CBD.
- To summarise, the proposed transport infrastructure provided for by the PPC can accommodate the traffic generated and avoids the need for the FDS transport pre-requisites being in place.
- The proposed Wastewater Packages 1 and 2 are anticipated to be completed by 2026/27 and when considering the anticipated timeframe for completing a PPC and the

subsequent development enabled by it, that timing will be consistent with the provision of the wastewater infrastructure. It is also noted that a wastewater pump station is provided for as part of the PPC to address capacity issues and is required to be implemented in order for development of the PPC land to occur.

- As detailed in the Water and Wastewater Servicing Memo in **Appendix I**, the required upgrades to the potable water network are being undertaken or proposed to be undertaken as part of the PPC to ensure future development can be sufficiently serviced for potable water.

Furthermore, the staging requirements included as part of the proposed Precinct provisions will ensure that the development of the PPC land will not occur until the relevant infrastructure has been provided. On this basis, it is considered that whilst the PPC land has been identified as being development ready not before 2035+ under the FDS, the PPC provides for a range of new and upgraded infrastructure. It ensures that future development is integrated with the existing and future environment in lieu of the pre-requisites being in place and noting that the FDS provides a pathway for out-of-sequence development to occur.

10.10 The Whenuapai Structure Plan

As touched upon previously, the PPC is consistent with the WSP, which anticipates medium-density residential uses on the PPC land. To further expand, on how the PPC has incorporated the outcomes of the WSP for the PPC land, the below additional assessment has been undertaken. The vision for Whenuapai under the WSP is outlined below:

“Whenuapai is a liveable, compact, and accessible place with a mix of high quality residential and employment opportunities. It makes the most of its extensive coastline, is well connected to the wider Auckland Region, and respects the cultural and heritage values integral to its distinctive character”

The PPC is consistent with the vision for Whenuapai as it will greatly contribute to the supply of housing in the north-west region in an area that is ideally located in relation to the Whenuapai town centre and the wider region, providing access to employment opportunities and services that support the function and vitality of residential neighbourhoods. In addition, the proposed infrastructure, and upgrades to existing roadings and other infrastructure will further integrate the PCC land to the surrounding area and wider Auckland region.

Furthermore, a range of key objectives are outlined in the WSP and are stated below:

1. *Sustainable urban development in Whenuapai*
2. *Quality built urban environment*
3. *A well-connected Whenuapai*

4. *The national significance of Whenuapai Airbase*
5. *The provision of infrastructure*
6. *Enhance the natural environment and protect natural heritage*
7. *The provision of quality open spaces*

The PPC is considered to be consistent with relevant objectives for the following reasons:

- The proposed MHU zoning will enable a variety of housing sizes and typologies to be developed that will greatly contribute to the supply of housing in an area that is ideally located within close proximity to employment opportunities, services, schools, and outdoor space to support the day to day needs and functions of future residents (Objective 1).
- A considerable range of roading infrastructure is proposed to support the integration of the PPC with Whenuapai and the wider surrounding area, this includes the urbanisation of Totara Road along the PPC frontage, provision of two bus stops on Totara Road, the formation of intersections on to Totara Road, including roundabouts, and the construction of new roads and cycle/pedestrian links across the PPC land to provide further connections to the surrounding area (Objective 2 & 3).
- The proposed Precinct Plan and associated provisions incorporate a range of standards and rules that recognise the national significance of the RNZAF Base Auckland to ensure it can continue to operate at the same standard and efficiency as per its current form (Objective 4).
- The PPC is supported by a comprehensive Stormwater Management Plan ('SMP') which includes key stormwater management principles that address both the site-specific and wider catchment requirements, whilst also aligning with the regionwide Network Discharge Consent ('NDC') (Objective 5).
- Native planting, restoration and protection of riparian areas and future drainage reserves will be provided to support and enhance the currently degraded ecological features of the PPC land, whilst also safeguarding these features for future generations (Objective 6).
- The indicative neighbourhood park will provide direct access to open space, and the proposed pedestrian/cycle link to the existing residential area to the south of the PPC land will provide direct and safe access to open space within the Whenuapai town centre (Objective 7).

Furthermore, the WSP identifies the PPC land as ready for development under Stage 2, which covers a considerable portion of northern and western Whenuapai, including land that can be

development ready in the next decade (2017-2027). The WSP identifies transport and infrastructure projects that may be constructed or upgraded in the Whenuapai area. The projects relevant for to the PPC under Stage 2 are outlined below:

- Capacity improvements at the SH16/Brigham Creek Road roundabout comprising signalling and increasing the number of lanes on all approaches and around the roundabout (Regional requirement, the rest WSP requirements).
- FTN bus routes to service WSP area.
- Additional lanes at the Brigham Creek Road/Totara Road/Mamari Road intersection.
- Local road connection between Riverlea Road and Totara Road near Rarawaru Creek.
- Capacity improvements at the Brigham Creek Road/Totara Road/Mamari Road intersection.
- Signals at Totara Road/Dale Road intersection.

The PPC includes upgrades to existing and new transport infrastructure to support the integration of the PPC land with the surrounding area, as discussed in Section 10.8 and detailed in the Integrated Transport Assessment prepared by Abley in **Appendix H**. It is considered that sufficient transport infrastructure has been provided for as part of the PPC to ensure future development enabled if the land is rezoned, can be accommodated by the existing transport network, whilst still ensuring that the upgrades integrate seamlessly with the surrounding environment and wider region.

Whilst it is acknowledged that the PPC does not provide for a cycle route in the location specified on the Transport Network Map, sufficient cycle infrastructure and links are provided on the PPC land to ensure a there is connected network of cycleways in the area. A footpath and separated cycleway are proposed along the site frontage with Totara Road to provide a cycle link between the Whenuapai Township and the PPC land. Additionally, a separated cycle/pedestrian link is proposed from McKean Road to the south into the PPC land to provide further cycle and pedestrian connections.

Overall, it is considered that the PPC has been developed to give effect to the overall objectives and aspirations of the WSP and, where required, has demonstrated that suitable infrastructure can be provided to support the PPC.

10.11 The Auckland Unitary Plan – Regional Policy Statement

When preparing or changing a district plan, Council must give effect to any regional policy statement.¹³ The ARPS in the AUP seeks to achieve the purpose of the RMA by providing an overview of the resource management issues for the region and establishing policies and methods to achieve integrated management of the region’s natural and physical resources.

¹³ s75(3)(c) RMA

In terms of issues pertaining to B2 urban form and growth, the AUP states that such growth needs to be provided in a way that:

- (1) enhances the quality of life for individuals and communities;*
- (2) supports integrated planning of land use, infrastructure and development;*
- (3) optimises the efficient use of the existing urban area;*
- (4) encourages the efficient use of existing social facilities and provides for new social facilities;*
- (5) enables provision and use of infrastructure in a way that is efficient, effective and timely;*
- (6) maintains and enhances the quality of the environment, both natural and built;*
- (7) maintains opportunities for rural production; and*
- (8) enables Mana Whenua to participate and their culture and values to be recognised and provided for.*

It is considered that Objective B2.2.1 and Policy B2.2.2(1), (3) and (7) are of particular relevance to this application:

B2.2.1 Objectives

- (1) 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) improved and more effective public transport;*
 - (e) greater social and cultural vitality;*
 - (f) better maintenance of rural character and rural productivity; and*
 - (g) reduced adverse environmental effects.*

.....
- (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 is integrated with the provision of appropriate infrastructure.*

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.*

- (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

- (7) *Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways 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*
 - (d) follow the structure plan guidelines as set out in Appendix 1.*

Furthermore, there are a number of objectives and policies that relate to residential growth that are of particular relevance:

B2.4.1 Objectives

- (1) Residential intensification supports a quality compact urban form.*
- (2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.*
- (3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.*
- (4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland’s diverse and growing population.*

B2.4.2 Policies

Residential intensification

- (1) Provide a range of residential zones that enable different housing types and intensity that are appropriate to the residential character of the area.*
- (2) Enable higher residential intensities in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space.*
- (3) Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.*
-*
- (6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.*
- (7) Manage adverse reverse sensitivity effects from urban intensification on land with existing incompatible activities.*
-*
- (11) Enable a sufficient supply and diverse range of dwelling types and sizes that meet the housing needs of people and communities, including:*
 - (a) households on low to moderate incomes; and*

- (b) *people with special housing requirements.*

Matters raised in B3 infrastructure, transport and energy are also relevant for the PPC, particularly:

B3.2.1 Infrastructure Objectives

- (1) *Infrastructure is resilient, efficient and effective.*
- (2) *The benefits of infrastructure are recognised, including:*
 - (a) *providing essential services for the functioning of communities, businesses and industries within and beyond Auckland;*
 - (b) *enabling economic growth;*
 - (c) *contributing to the economy of Auckland and New Zealand;*
 - (d) *providing for public health, safety and the well-being of people and communities;*
 - (e) *protecting the quality of the natural environment; and*
 - (f) *enabling interaction and communication, including national and international links for trade and tourism.*
- (3) *Development, operation, maintenance, and upgrading of infrastructure is enabled, while managing adverse effects on:*
 - (a) *the quality of the environment and, in particular, natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character;*
 - (b) *the health and safety of communities and amenity values.*
- (4) *The functional and operational needs of infrastructure are recognised.*
- (5) *Infrastructure planning and land use planning are integrated to service growth efficiently.*
- (6) *Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development.*
- ...
- (8) *The adverse effects of infrastructure are avoided, remedied or mitigated.*

B3.3.1 Transport Objectives

- (1) *Effective, efficient and safe transport that:*
 - (a) *supports the movement of people, goods and services;*
 - (b) *integrates with and supports a quality compact urban form;*
 - (c) *enables growth;*
 - (d) *avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and*
 - (e) *facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community*

B3.3.2 Transport Policies

Managing transport infrastructure

- (1) Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.*
- (2) Enable the movement of people, goods and services and ensure accessibility to sites.*
- (3) Identify and protect existing and future areas and routes for developing Auckland's transport infrastructure.*
- (4) Ensure that transport infrastructure is designed, located and managed to:*
 - (a) integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and*
 - (b) provide effective pedestrian and cycle connections.*

Integration of subdivision, use and development with transport

- (5) Improve the integration of land use and transport by:*
 - (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
 - (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods;*
 - (c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes;*
....
 - (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.*

In summary, the PPC will give effect to the RPS in that:

- It will contribute to a compact urban form as it will enable a high-quality urban environment that promotes economic growth and achieves a better use of the land and provides for new infrastructure, in addition to contributing to development capacity and land supply that is integrated with the provision of appropriate infrastructure (B2.2.1).
- The PPC provides for the provision of bus stops along Totara Road to support the use of public transport and provide an accessible and direct connection to the wider public transport network, whilst also reducing the rate of private vehicle trips (B2.2.1) and (B3.3.2(5)).

- It provides for the rezoning of land within the Rural Urban Boundary, as anticipated by the PPC land's FUZ (B2.2.2(1)).
- The proposed MHU zone is entirely consistent with the WSP, which was completed in accordance with Appendix 1 Structure Plan guidelines and includes sufficient infrastructure upgrades to support the proposed rezoning and wider surrounding environment (B2.2(3)).
- It supports the provision of residential land in an area that is well-located in regard to transport connections, community and recreation facilities, and amenities (B2.2.2(7)).
- The PPC includes a range of new infrastructure and upgrades of existing infrastructure to support the function of the existing and future surrounding environment. Where planned infrastructure is not provided for by the PPC, suitable alternatives have been provided that will sufficiently service the PPC land and surrounding area (B2.2.2(7)) and (B3.2.1(5)).
- It will enable a range of housing typologies to be developed that will greatly increase housing supply, choice and variety in an area that has been earmarked for residential development for a considerable period of time and is well connected to the north-west and greater Auckland region (B2.2.2(7)) and B2.4.1(4)).
- It will enable extensive residential capacity within relatively close proximity to Westgate, a significant sub-regional centre that provides ample employment opportunities and access to a wide range of amenities and services that support the vitality and function of residential neighbourhoods (B2.4.1(3)).
- The PPC includes extensive walking and cycling infrastructure across both the PPC land and its frontage, with an additional pedestrian and cycle link to the existing residential area to the south also proposed to further increase connectivity with the surrounding area (B3.3.2).

It is therefore considered that the PPC is consistent with the outcomes sought under the ARPS.

10.12 The Auckland Unitary Plan – Objectives and Policies

The PPC seeks to identify the PPC land as MHU zone and proposes the Whenuapai Green Precinct across the land. The PPC will give effect to the relevant AUP objectives and policies in relation to the MHU zone and the relevant city-wide objectives and policies, as outlined below.

10.12.1 Zoning: H5.2 Residential – Mixed Housing Urban zone

Objectives H5.2 (1) – (3) and Policies (1) – (10)

The MHU zone is a medium density zone and provides for urban living in the form of dwellings, terrace housing and low-rise apartments of typically three storeys in height to support increasing the capacity and choice of housing within neighbourhoods, as well as fostering a sense of community and supporting local centres. The MHU zone is the most appropriate zone for the PPC land because it is consistent with the WSP and the surrounding existing residential character and will enable greater housing capacity in an area anticipated for urbanisation. In summary, the PPC is considered to be consistent with the MHU zone for the following reasons:

- The PPC land is located within proximity to a wide range of activities, including commercial and employment hubs, everyday amenities, community facilities, transport connections and open space that will contribute to creating a well-functioning urban environment and provide for people’s social, cultural, and economic well-being.
- Future development enabled by the rezoning of the PPC land will be in keeping with the established medium-density housing directly to the south and elsewhere in Whenuapai, in keeping with the neighbourhood character and the planned urban built form.
- Future development enabled by the PPC will be developed in accordance with the MHU zone provisions, which will ensure that that a high-quality built environment is achieved that achieves a suitable level of amenity.
- Any future non-residential development proposed on the PPC land if rezoned will be developed to ensure it is in keeping with the character of the area and will support the economic and social well-being of the community.
- The PPC will enable otherwise underutilised land to be used efficiently, providing for medium-density housing that will increase housing capacity and choice.
- Whilst it is acknowledged that the rezoning of the PPC land will result in a change to the existing outlook, it is considered that the change is anticipated due to the land’s current FUZ and will be developed as a seamless extension of the existing medium-density housing directly to the south of the PPC land. Therefore, the application of the MHU zone is appropriate for the site and will enable a residential community that is in keeping with the existing residential character and in an optimal location to be established.

10.12.2 Chapter E – Auckland-wide Provisions

10.12.2.1 E1 Water quality and Integrated Management

Objectives E1.2 (1) – (3) and Policies E1.3 (2) – (8), and (10) – (14)

Chapter E1 contains objectives and policies that aim to ensure freshwater quality is maintained and enhanced, the mauri of freshwater is improved over time, and stormwater networks are managed to prevent or minimise adverse effects of contaminants on freshwater quality. The objectives and policies of Chapter E1 are also relevant to Chapter E8 Stormwater – Diversion and Discharge.

As set in Section 10.4.2, the PPC is considered to be consistent with the outcomes sought under the National Policy Statement for Freshwater Management.

Other policies require that contamination that would have an adverse effect on the life supporting capacity of freshwater and its ecosystem should be avoided (Policy 4). Stormwater management for development in greenfield areas is specifically addressed in Policy E1.3(8), which seeks to avoid as far as practicable, or otherwise minimise or mitigate, adverse effects of stormwater runoff from greenfield development on freshwater systems, freshwater, and coastal water by:

- (a) taking an integrated stormwater management approach (refer to Policy E1.3.10);*
- (b) minimising the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads and into sensitive receiving environments;*
- (c) minimising or mitigating changes in hydrology, including loss of infiltration, to:
 - (i) minimise erosion and associated effects on stream health and values;*
 - (ii) maintain stream baseflows; and*
 - (iii) support groundwater recharge;**
- (d) where practicable, minimising or mitigating the effects on freshwater systems arising from changes in water temperature caused by stormwater discharges; and*
- (e) providing for the management of gross stormwater pollutants, such as litter, in areas where the generation of these may be an issue.*

A comprehensive SMP has been prepared by NCL (provided in **Appendix J**) to ensure that future development enabled by the PPC sufficiently manages the water quality effects on the surrounding area. The Whenuapai Green Precinct has incorporated key aspects of the SMP to ensure the outcomes sought under Chapter E1, with particular regard to Policy 8, can be provided for by the PPC.

Policy 10 of Chapter E1 outlines what must be given regard to by an integrated stormwater management approach and includes the use of natural hydrological features and green infrastructure for stormwater management where practicable. The SMP and proposed Precinct provisions provide for this and utilise a range of stormwater management tools to achieve an integrated stormwater management approach.

Furthermore, the proposed Precinct provisions in relation to stormwater management and water quality are consistent with the objectives and policies of Chapter E1. As touched on above, the PPC proposes to utilise a range of natural hydrological features, to ensure stormwater runoff is treated and mitigated prior to discharging to the surrounding environment. The SMP provides for treatment of all stormwater runoff from the proposed roading infrastructure to further maintain and enhance the water quality of the area. In addition, the proposed planting of riparian areas, wetlands and elsewhere on the PPC land with native vegetation will further enhance the quality of the natural environment.

10.12.2.2 E3 – Lakes, rivers, streams, and wetlands

Objectives (2), (3) and (5) and Policies (2), (3), (6), (8), (10), (11), (12) and (15).

A combination of intermittent, permanent, and artificial watercourses are located around the boundaries of the PPC land. An unnamed tributary of Rarawaru Creek enters the PPC land in the north-eastern corner and the remaining watercourses are located along the southern and western boundaries of the PPC land. The PPC has been designed to protect and enhance the riparian areas to ensure they are not adversely impacted by future development enabled by the PPC. No stream reclamation is proposed, and the proposed Precinct provisions incorporate extensive native planting requirements to ensure the ecological value and biodiversity of these areas is greatly improved from their current forms. The riparian margins will safeguard and protect the ecological values of the PPC land (Policy 15). It is considered that protection afforded by the riparian setbacks and the extensive native planting, which will be eco sourced where possible, is consistent with the following:

Objective

(5) Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.

Policy

(6) Enable the enhancement, maintenance and restoration of lakes, rivers, streams or wetlands.

(10) Enable the planting of any plant, excluding pest species, in, on, or under the bed of a lake, river, stream or wetland where it is suitable for habitat establishment, restoration or enhancement, the maintenance and enhancement of amenity values, flood or erosion protection or stormwater runoff control provided it does not create or exacerbate flooding

(11) Encourage the planting of plants that are native to the area

The applicant has initiated consultation with Mana Whenua and is committed to ongoing dialogue with iwi to ensure the ecological values of the PPC land are managed in accordance with mātauranga and tikanga Māori.

Any future structures within close proximity to the ecological features will be designed to minimise impacts as much as practical and any infringements by future development to the riparian yard setbacks will be subject to future resource consent applications. Furthermore, no stream reclamation is anticipated to be required, and existing streambeds will be reinstated to further enhance and restore waterways.

10.12.2.3 E11 and E12 – Land Disturbance – Regional and District

The PCC would be consistent with the anticipated outcomes of the objectives and policies of Chapters E11 and E12. Whilst earthworks are an essential prerequisite of land development, they need to be managed and conducted in a way that reduces the amount of sedimentation entering waterways and other bodies of water.

The objectives and policies of Chapters E11 and E12 outline the need to manage land disturbance so any adverse effects on the environment are mitigated, people's safety is protected and sedimentation, particularly the extent of sediment entering waterways, is minimised. Future development of the PPC land will be undertaken in accordance with the Whenuapai Green precinct provisions and will be required to comply with all relevant Auckland-wide provisions, including Chapters E11 and E12. Therefore, it is considered that the outcomes sought by Chapter E11 and E12 will be provided for by future development of the PPC land and will be consistent with the chapters objectives and policies.

10.12.2.4 E15 – Vegetation Management and Biodiversity

Objectives (1) and (2) and Policies (1) – (4).

The above objectives and policies seek to ensure that vegetation and planting contribute to a range of ecosystem services, such as erosion and sediment control, management of stormwater flows, the protection of amenity and natural character values, and the enhancement of water quality, whilst minimising natural hazards and their impact. Vegetation is a critical part of terrestrial ecosystems and greatly contributes to maintaining and enhancing indigenous biodiversity.

It is also noted that only a small portion of native vegetation is present within the permanent stream on the PPC land and is located within the riparian yard setbacks. Therefore, any native vegetation is required to be removed by future development enabled by the PPC will be subject

to further consenting requirements. Native planting and regeneration will be undertaken along the identified waterways and wetlands and will greatly improve the PPC land from its current degraded state. Furthermore, the proposed precinct provisions will provide for planting of riparian areas to further safeguard and enhance the biodiversity of the PPC land. It is therefore considered that the PPC is consistent with the relevant objectives and policies of Chapter E15.

10.12.2.5 E27 – Transport

Objectives (1) – (5) and Policy (1).

Objectives and policies in E27 seek to support and manage the effects on the operation and development of an integrated transport network. The relevant objectives are listed below:

- (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.**
- (2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.*
- (3) Parking and loading is managed to support urban growth and the quality compact urban form.*
- (4) Parking, loading and access is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options of the location.*
- (5) Pedestrian safety and amenity along public footpaths is prioritised*

The proposed approach to roading upgrades, the provision of new roading infrastructure, integration with the existing transport network and the traffic effects of the PPC have been comprehensively assessed by Abley in **Appendix H**. Specific Precinct provisions for the provision of transport infrastructure have been incorporated into the PPC to provide for the safe and efficient operation of the surrounding transport network.

As noted by Abley, in addition to the transport infrastructure proposed as part of the PPC, the PPC land will be well serviced by public transport, walking, and cycling connections planned by Te Tupu Ngātahi Supporting Growth Alliance and Waka Kotahi through the North West Auckland transport upgrades. The proposed roading upgrades have been designed to account for future growth and incorporate provisions for future bus stops, intersection upgrades and a separate pedestrian/cycling link, to encourage and provide for alternative modes of transport to the private motor vehicle and to encourage active modes and public transport.

Therefore, the PPC is consistent with the policies and objectives of E27.

10.12.2.6 E36 – Natural Hazards and Flooding

The relevant Natural Hazards and Flooding objectives and policies are Objectives E36.2 (1), (4), (5) and (6) and Policies E36.3 (17) – (30).

The PPC is considered to have sufficiently addressed the flooding on the PPC land and is consistent with the policies and objectives of E36. The flood assessment provided by NCL in **Appendix J**, outlines that any adverse flood effects can be sufficiently mitigated to not create further flood risk or exacerbate the existing flood risk on neighbouring properties and the downstream environment. The effects of the PPC on the existing flooding is, on the basis of the assessment undertaken by the applicant likely to be negligible due to the attenuation proposed to prevent any significant increase in the potential flooding of the surrounding area.

Overall, the PPC is consistent with the objectives and policies of E36 as an assessment of the existing flood risk has been undertaken and it has been demonstrated that the impact from the PPC can be managed and mitigated, subject to the normal assessment required by the standards of E36 at the time of subdivision.

10.12.2.7 E38 – Subdivision

The relevant subdivision objectives and policies are Objectives E38.2 (1) – (9) and Policies E38.3 (1).

The objectives and policies of Chapter E38 seek to ensure that subdivision is undertaken in a manner that achieves the objectives of the underlying zones, precincts, and the Auckland-wide provisions. Subdivisions should be designed to cater for the long-term needs of the community and strive to minimise adverse effects of development on to the surrounding environment. Infrastructure should be provided in an integrated manner and be in place prior to subdivision occurring. The layout and design of subdivisions should be safe, efficient, and accessible, aspects which support a well-functioning urban environment.

Ecological features, such as native vegetation and streams, should be provided for and enhanced by subdivision. Provision should be made for pedestrian/cycle linkages to ensure accessibility and integration with surrounding land uses. An integrated stormwater management approach and principles should be utilised, and where appropriate, land should be vested for infrastructure.

The PPC is consistent with the relevant objectives and policies of Chapter E38. As outlined in the precinct provisions, development cannot proceed until the required infrastructure is in place. Streams and natural wetlands identified within the PPC land will be protected by the proposed riparian areas and the extensive native planting required will further safeguard the ecological features of the PPC land.

In addition, stormwater management and water principles will be incorporated with the riparian areas. Sufficient provisions have been outlined in the proposed precinct to provide for roading and other infrastructure to ensure safe and sufficient access across the PPC land, as well as access to future infrastructure. A pedestrian/cycle link to McCaw Avenue is also provided for as part of the precinct plan to further increase pedestrian access to the PPC land.

10.13 Conclusion regarding the Statutory Framework

The PPC is considered to be consistent with the outcomes of the Auckland Plan 2050. That plan places a strong focus on providing housing supply that caters for a range of sizes, typologies, and family structures to provide housing choice and variety for Aucklanders. The proposed MHU zoning and Precinct is consistent with the NPS-UD as it will provide housing supply over the medium to long term to meet the significant demand from a popular and growing region of Auckland.

In relation to the AUP, the PPC directly addresses major themes of the ARPS, with particular regard to achieving the integration of land use and transport infrastructure with specific Precinct provisions that have direct regard to the features and existing uses of the surrounding area, whilst still enabling the anticipated residential activities to occur on the PPC land.

The PPC is consistent with the general objectives and policies of the MHU zone and meets the outcomes sought for medium-density residential activities. The inclusion of Precinct provisions specific to the Whenuapai context will protect the ongoing use, function, and amenity of surrounding existing activities and ensure they are not compromised by the proposed residential uses.

The PPC is also consistent with the objectives and policies of the identified Auckland-wide chapters.

10.14 Other Relevant Planning Documents

10.14.1 Upper Harbour Local Board Plan 2020

The Upper Harbour Local Board Plan 2023 outlines the aspirations sought for the area and has a focus on five outcomes:

1. *Our people: supporting people in our diverse communities*
2. *Our environment: protecting our natural environment*
3. *Our community: supporting community participation with our services and infrastructure*
4. *Our places: supporting growth, development, transport, and accessibility*
5. *Our economy: supporting our economic development*

One of the aims of the Upper Harbour Local Board Plan is to support people and their communities. The PPC achieves this by enabling high-quality, medium density housing in area that is well connected to surrounding employment centres, services, transport connections and outdoor space that support the vitality and function of residential neighbourhoods. The indicative neighbourhood park will support community socialisation and participation, with the cycle/pedestrian link provide a direct connection towards the Whenuapai Township.

In addition, the proposed Precinct provisions will ensure that the proposed residential land use does not compromise the existing ecological features and will greatly enhance the ecology of the PPC from its existing state via the extensive native planting proposed across the PPC land. Overall, it is considered that the PPC will not be contrary to the Upper Harbour Local Board Plan and will assist in delivering many of the outcomes sought.

10.14.2 Upper Harbour Greenways Plan

The Upper Harbour Greenways Plan is the latest plan outlining the network of greenways and linkages to improve local ecological and recreational opportunities. The Whenuapai and Herald Island area of the Greenways Plan, which relates to the PPC land, is shown below:

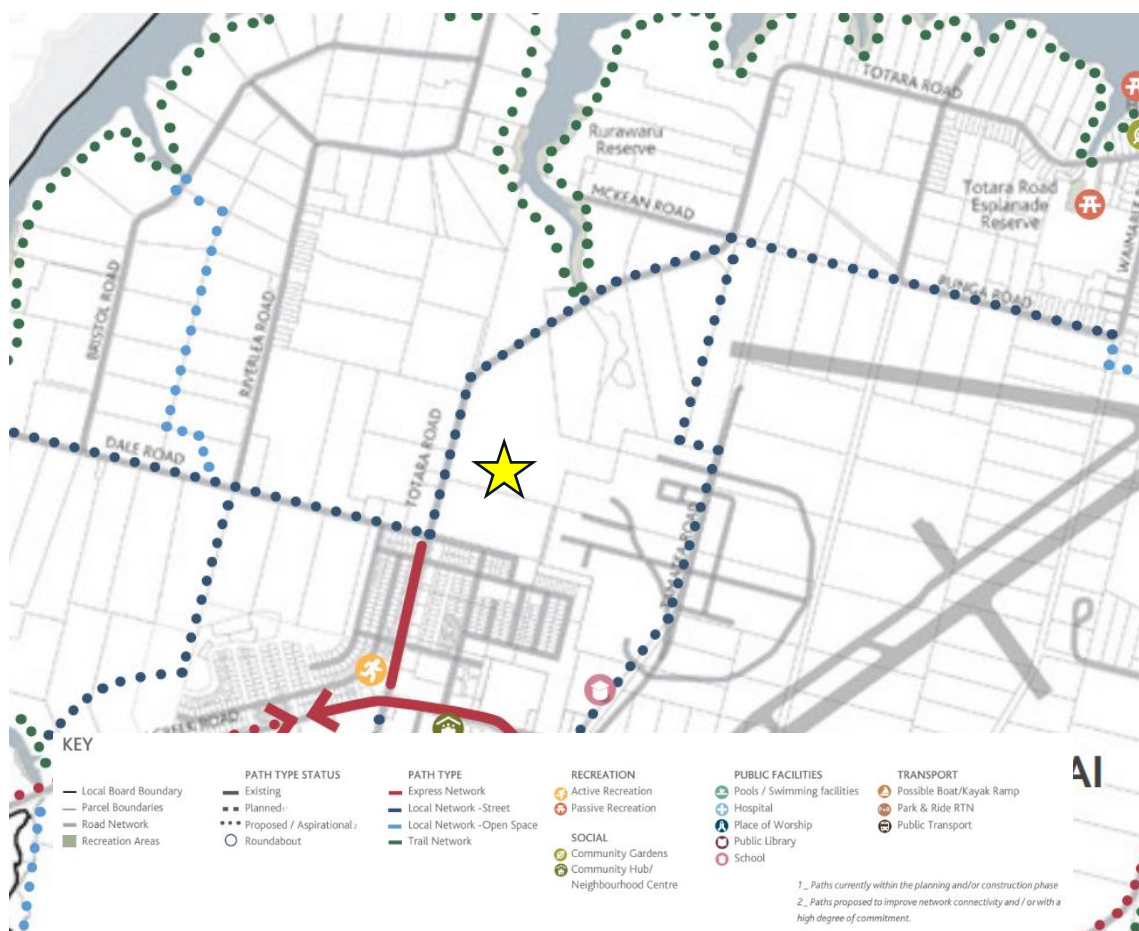


Figure 20 - Greenways Plan in relation to the PPC land

The PPC land borders a proposed street path along Totara Road, which is provided for as part of the works along the PPC frontage. The existing street berm along the portion of Totara Road which fronts the PPC land will be upgraded with separated pedestrian and cycling facilities to implement the envisaged link.

In addition to the PPC being consistent with (and giving effect to) the linkages proposed under the Upper Harbour Greenways Plan, further pedestrian, cycle, and green linkages are proposed within the PPC land. An indicative pedestrian cycle link is proposed from the southern eastern corner of the PPC land to connect the internal road network with McCaw Avenue.

It is therefore considered that the aspirations of the Upper Harbour Greenways Plan for Whenuapai have been integrated into the PPC to ensure sufficient pedestrian and cycling linkages and access are provided.

11.0 Environmental Effects

A number of specialist reports have been obtained to understand the likely effects of the proposed zone change. Those reports are as follows:

- Ecological Impact Assessment – Viridis (**Appendix A**)
- Site Investigation Reports – Geosciences (**Appendix G**)
- Integrated Transport Assessment – Abley (**Appendix H**)
- Water and Wastewater Servicing Memo – Water Acumen (**Appendix I**)
- Stormwater Management Plan – Neil Construction Limited (**Appendix J**)
- Acoustic Assessment – Earcon (**Appendix K**)
- Geotechnical Report – CMW Geosciences (**Appendix L**)
- Archaeological Investigation Report – Clough & Associates (**Appendix M**)
- Urban Design Report – Urban Acumen (**Appendix N**)
- Landscape Visual Assessment – LA4 (**Appendix O**)
- Cultural Impact Assessment for Whenuapai Green Fast Track Application (**Appendix P**)

The reports have comprehensively considered the potential environmental effects of the PPC and demonstrate that the new zoning and proposed Precinct can be applied to the PPC land in a manner that will ensure effects on the surrounding environment and existing land uses are appropriately managed.

11.1 Ecological Effects

An ecological assessment of the PPC has been undertaken by Viridis and is provided in **Appendix A**. The ecological report outlines the current state of ecological values on the PPC land and the potential effects the PPC may have on the identified values. The assessment of the PPC land included a desktop review, which included an examination of current and historical aerial imagery of the site, site visits and site assessments. Based on this assessment, the presence and extent of freshwater and terrestrial features within the PPC land and surrounding area were identified. The assessment identified and classified any permanent and intermittent waterways, natural inland wetlands, and native vegetation present on or within close proximity to the PPC land.

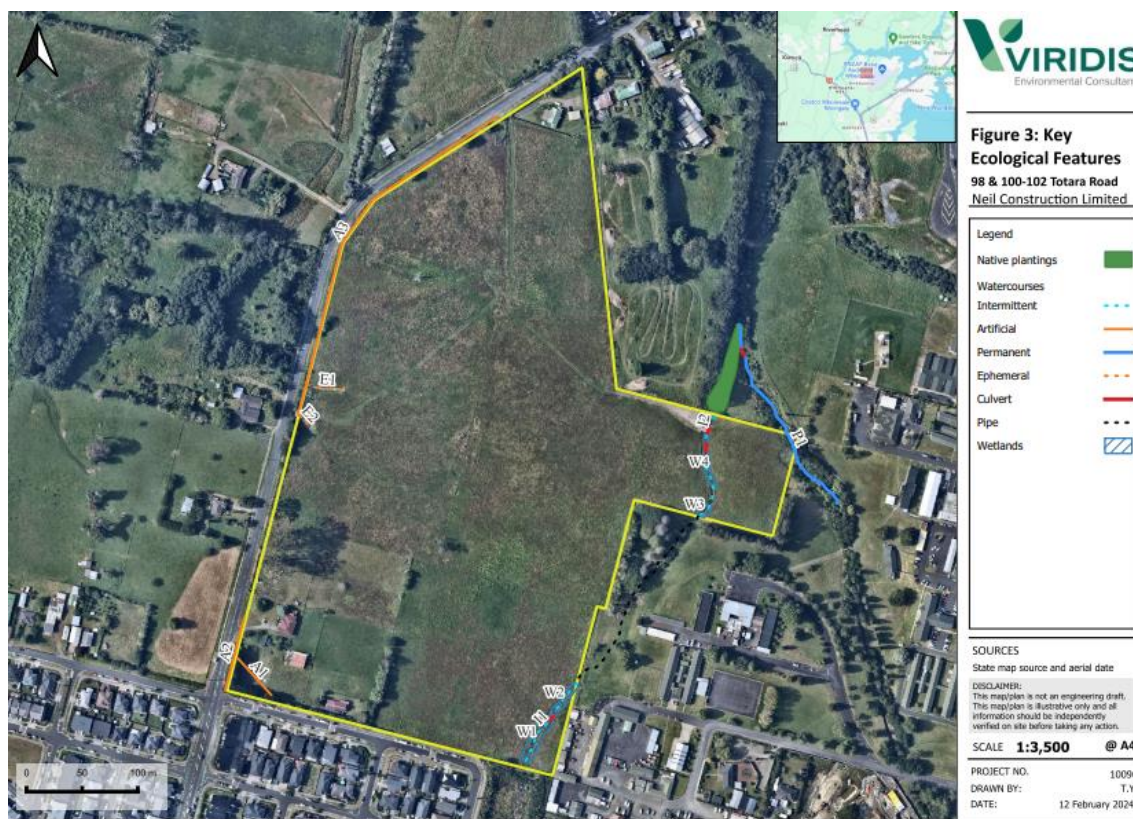


Figure 21 - Ecological features identified on the PPC land and immediate surrounding area

Viridis locates the PPC land in the Tāmaki Ecological District, which is characterised by harbours and coastal areas with a strong influence from volcanic activity. Significant vegetation clearance has now occurred, and the district is characterised by urban areas. The wider area surrounding the PPC land is semi-rural as it contains a range of residential development and the RNZAF Base Auckland.

The vegetation present on the PPC land was assessed by Viridis and was found to be comprised of predominantly garden and amenity planting, shelterbelts, and riparian vegetation. Managed pasture was also a dominant vegetation type. Indigenous vegetation is limited to small area of the permanent stream in the north-east corner of the PPC land and the majority of the site was dominated by exotic species. No Significant Ecological Areas are present within the PPC land and due to the dominance of managed pasture, vegetation is limited to small clusters across the site. On this basis, Viridis determined that the ecological function and botanical value of the vegetation on the site is low, and the proposed rezoning will have minimal adverse effects on the existing vegetation.

Viridis also considers that the proposed riparian planting and other future landscaping on the PPC land will enhance the ecological values of the site from its current state. Future riparian planting will be comprised of native plants and will greatly improve the state of the riparian and wetland areas on the PPC land.

An assessment of terrestrial fauna habitats present on the PPC land was also undertaken and identified that NZ Pipit, Copper Skink and Long Tail Bats may potentially be present within the PPC land. Due to the existing vegetation on the site being potential habitats for the identified species, Viridis conservatively assessed the ecological value of the site for NZ Pipit and Copper Skinks as 'moderate', and for Long Tail Bats, as 'high'. This conclusion is based on the few identified ecological features on the PPC land having the potential to provide habitat for these at-risk species, with the majority of the PPC land comprised of low-value managed pasture. It is considered that the future planting of riparian and wetland areas, and the provision of management plans as part of future development enabled by the PPC will be able to mitigate adverse effects generated by the PPC.

The ephemeral streams and artificial channels identified on the PPC land were determined by Viridis to have negligible ecological values due to their degraded state from the historic land uses on the PPC land. The two intermittent streams identified within the PPC land were found to have low ecological value, as well as the wetland areas identified within the stream area. As part of the PPC, the stream and wetlands will be protected via a riparian setbacks that will be extensively planted with native vegetation and will greatly improve the ecological value of the area from its current state. It is therefore considered that any adverse effects generated by the proposed change in land use can be sufficiently managed and mitigated by riparian setbacks, erosion and sediment controls, and the extensive native planting proposed.

Viridis identified a permanent stream, being an unnamed tributary of the Rarawaru Creek, which traverses the north-eastern corner of the PPC land. The stream provides moderate habitat for fauna with a mix of pools and runs, and a substrate comprised of a mix of bedrock, soft sediment, and cobble. The permanent stream on the site was assessed by Viridis as having moderate ecological value due to upstream environment and likely spawning habitat for īnanga. In a similar vein to the identified intermittent streams and wetlands, the permanent stream will be protected via the riparian yard setbacks and any future development within proximity to the stream will be managed by the future consenting process.

Based on the above assessment, the following conclusions are made by Viridis:

“Neil Construction Limited are applying to Auckland Council for a PPC to rezone the land at 98 and 100- 102 Totara Road, Whenuapai, from FUZ to MHU zone under the AUP OP.

The existing terrestrial and freshwater ecological values of the site have been identified and assessed. It is considered the PPC is appropriate for the area from an ecological perspective and can protect and enhance the indigenous biodiversity values of the site in accordance with the outcomes of relevant plans and policy documents while providing for efficient development.

Overall, it is considered that the proposed PPC can effectively manage any adverse effects of residential development on the natural environment through the existing planning provisions and policy framework within the AUP-OP. Any potential adverse effects can be adequately mitigated through appropriate stormwater design, fauna management plans, restoration and riparian planting, and detailed design.”

We adopt the conclusion made by Viridis and consider that any adverse effects generated by the PPC can be sufficiently mitigated and managed.

11.2 Contamination Effects

Geosciences have undertaken Preliminary Site Investigations ('PSI') on the PPC land, and these are provided in **Appendix G**. The following sources of potential contamination were identified in areas surrounding the existing dwellings and historic shed locations as a result of the investigation:

- Historic use of lead based paints on the residential house – encompassed under HAIL Item I where a risk to human or environmental health is present only.
- Possible utilisation of Asbestos Containing Materials within the construction of the house – HAIL Item E.1 only when in broken or degraded condition; and
- Presence of a septic tank and effluent disposal system associated with the residential house – HAIL Item G.5 / G.6

Upon completion of a Detailed Site Investigation ('DSI'), there was determined to be lead based paint contaminated soil halos around the dwellings on the site, comprising a total area of 462m² and a total volume of 138.6m³. A Site Management Plan (**Appendix G**) was then subsequently prepared following the findings and recommendations of the site investigations to outline the controls that will protect human and environmental health for the duration of any future earthworks enabled by the PPC. It is noted that based on the size of the land parcels, under the National Environment Standard for Assessing and Managing Contaminants in Soil to Protect Human Health that this level of soil disturbance would be a permitted activity and can be appropriately remediated by future works on the PPC land.

It is therefore considered that the minute levels of contamination identified on the PPC land can be appropriately managed by future development works and will not impede the proposed change in land use.

11.3 Transport Effects

Transportation effects have been comprehensively considered in the Integrated Transport Assessment ('ITA') prepared by Abley in **Appendix H**. The ITA has been prepared in discussion with Auckland Transport and in accordance with best-practice documents. Abley has undertaken an assessment of the proposed internal transport network, and potential off-site transport effects of the PPC, and conclude that the PPC land is appropriate for the proposed change in land use from a transport perspective.

The ITA provides a detailed description of the existing land use and transport environment, including the immediate surrounding road network, future land use and transport environment, including other PPC Whenuapai and wider roading upgrades, and the wider transport network.

Precinct provisions have been proposed for the implementation and integration of the proposed transport infrastructure with the surrounding road network. As outlined by Abley, the main transport aspects proposed as part of the PPC are as follows:

- Internal road network.
- Establishment of intersections onto Totara Road, including roundabouts at the northern intersection and the existing Totara Road/Dale Road/McCaw Avenue intersection.
- Upgrade of Totara Road along the PPC frontage to an urban standard.
- Future proofed road connections to surrounding land.
- Provision of bus stops on Totara Road.
- Minor line marking changes to the Brigham Creek Road/Totara Road intersection to enable a shared through/left turn lane for eastbound traffic.

As detailed on the proposed precinct plan, internal roads of varying widths that include pedestrian and cycling infrastructure, are proposed across the PPC land in addition to separate pedestrian and cycle links. The proposed internal roads will vary in width from 15m to 24m and will be finalised as part of future detailed design processes. The upgrade of Totara Road along the PPC frontage will include the provision of pedestrian footpaths and cycleways and will bring it to a standard consistent with Auckland Transport requirements. All new internal roads and the upgrade of Totara Road along the PPC land frontage will be undertaken in accordance with the Road Function and Design Elements Table within the proposed precinct provisions. The indicative bus stop locations are also shown on the precinct plan and will provide direct access to the local and wider Auckland public transport network, as summarised by Abley below:

“As part of the plan change, an upgrade of Totara Road is proposed to bring it to a standard that will be safer for use by road users and also align it with Auckland Transport’s vision for the corridor in the future. Adequate road space is provided in the cross section of the Totara Road upgrade to allow for the construction of bus stops in the future, which are proposed by NCL. A footpath and separated cycleway are also

proposed along the site frontage with Totara Road which will support active travel choice. Therefore, the proposal is considered consistent with the direction and focus of the RLTP.”

As part of the ITA, Abley undertook a detailed assessment of the impact of future residential development enabled by the PPC on the surrounding transport network. Their assessment found that the surrounding road network can accommodate the level of traffic generated by future development enabled by the PPC. Whilst Abley notes that the PPC is anticipated to increase delays at the SH16/Brigham Creek Road intersection, alternative routes (such as SH18/Brigham Creek Road and Spedding Road extension) will be available and will likely lead to a degree of rerouting. Waka Kotahi SH16 Brigham Creek Road to Waimauku Safety Improvements project and Kumeu State Highway bypass project will provide relief in the medium to long term. It is therefore considered that the surrounding road network can accommodate the traffic enabled by the PPC and the transport infrastructure proposed as part of the PPC, in combination with larger network upgrades by Waka Kotahi, will sufficiently manage adverse transport effects.

Furthermore, Abley has outlined and assessed the transport infrastructure prerequisites listed for Whenuapai North (Stage 1) in the FDS and conclude that the roading upgrades proposed as part of the PPC can accommodate the traffic generated and avoids the need for the FDS transport infrastructure prerequisites to be in place before the PPC.

Abley’s assessment is concluded with the following:

“The transportation assessment of the proposed rezoning of 98-102 Totara Road has focused on the likely impacts of establishing a medium density residential development. It is concluded that the site is appropriate for this activity from a transport perspective for the following reasons:

- *The proposed development will be well served by public transport, walking and cycling connections in the near future which are currently being planned by Te Tupu Ngātahi Supporting Growth Alliance and Waka Kotahi through the North West Auckland transport upgrades and SH16 Brigham Creek to Waimauku Safety Improvements respectively.*
- *A Precinct is proposed, including provisions to direct transport outcomes from development*
- *There is excellent accessibility to key local activities and services by all modes.*
- *The Brigham Creek / Totara Road / Mamari Road intersection performs acceptably with the addition of traffic from the site*

- *The site is well-served by SH16 and SH18. While the Plan Change is expected to increase delays at the SH16 / Brigham Creek intersection, alternative routes (such as SH18/Brigham Creek Road and Spedding Road extension) will be available and will likely lead to a degree of rerouting. Further, Waka Kotahi’s SH16 Brigham Creek to Waimauku Safety Improvements project and Kumeu State Highway bypass projects will provide relief in the medium to long term.*
- *The SH18/Brigham Creek Road intersection performs well in peak hour, and with the closure of the Sinton Road arm this intersection has significant capacity available to accommodate traffic from the Plan Change.*
- *The traffic modelling results demonstrates that the Totara Road / Dale Road / McCaw Avenue intersection will operate in free-flowing conditions with the additional generated traffic. The Totara Road / Brigham Creek Road / Mamari Road intersection will operate well within in capacity of the intersection.*
- *The roading upgrades proposed as part of the plan change can accommodate the traffic generated and avoids the need for the FDS key transport infrastructure prerequisites being in place.”*

It is therefore considered that the transport infrastructure proposed sufficiently mitigates any adverse transport effects on to the environment from the PPC.

11.4 Infrastructure Effects

Information and assessments relating to stormwater has been prepared by NCL and the SMP for the PPC is provided in **Appendix J**. Water Acumen has prepared a report for the water and wastewater servicing for the PPC land and is provided in **Appendix I**.

11.4.1 Wastewater

As outlined in the report prepared by Water Acumen and in the below figure, the wider catchment is proposed to be serviced by a new wastewater pump station located on McKean Road, on to rising main(s) and gravity sewer along Brigham Creek Road into the proposed gravity line being constructed from the existing Tamiro wastewater pump station and the proposed Slaughterhouse Creek wastewater pump station.

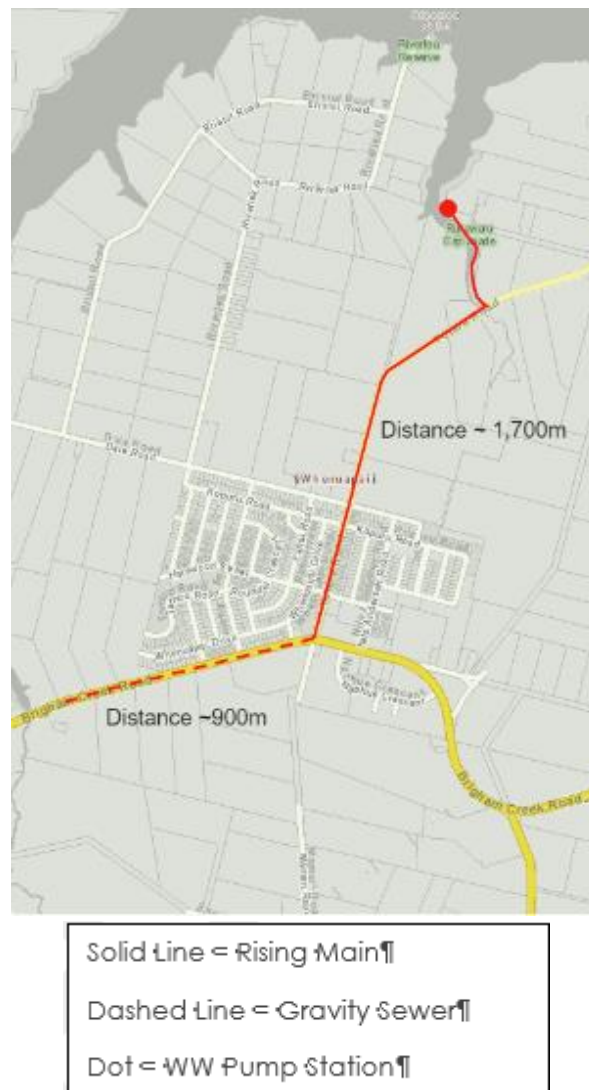


Figure 22 - Wider wastewater scheme overview

NCL has determined that a single pump station located on McKean Road can service the wider area via a gravity line from the PPC land to the pump station. The proposed wastewater pump station location is provided within the Auckland Wastewater Network Comprehensive Wastewater Network Discharge Permit or the ‘NDC’ and is marked as N34 within the NDC. This provides for wastewater discharge from any new engineered overflow point which is zoned for urban activity and is within a future network.

Water Acumen makes the following conclusions in regard to wastewater:

“This proposal considers servicing the plan change area along with the wider catchment.

It is noted that there is no capacity within the existing Tamiro WWPS and connection to the wider wastewater network would only be available after construction and

commissioning of the proposed Slaughterhouse Creek WWPS and Massey Connector, programmed for delivery in 2027.

The recommended infrastructure would include:

- *a new Wastewater Pump Station in McKean Road, with emergency storage equal to 8 hours Average Dry Weather Flow (ADWF).*
- *twin rising mains from the WWPS to the intersection of Totara and Brigham Creek Road (provisionally 160DN and 225DN rising mains)*
- *a new gravity main located within Brigham Creek Road to the Slaughterhouse Wastewater Pump Station*

This infrastructure would service the entire plan change area, along with the wider catchment that is able to be connected to the proposed wastewater pump station location.”

As noted by Water Acumen, wider wastewater upgrades are required in order for the PPC land to be sufficiently serviced. To ensure sufficient capacity is available to support future development, the proposed Wastewater and Water Supply Infrastructure Standard within the proposed Precinct Provisions outlines that the occupation of any new buildings within the Precinct can only proceed following the completion and commissioning of bulk water supply and wastewater infrastructure required for servicing of all development within the Precinct, which includes the Whenuapai Wastewater Packages 1 and 2 being operational.

When considering the above, the proposed wastewater infrastructure is sufficient to allow for the PPC land to be rezoned and will enable adverse effects to be appropriately managed.

11.4.2 Water supply

The Whenuapai area is serviced via two existing 315 PE water mains, one from Fred Taylor Drive to the west and the other from Hobsonville Road to the east. Regarding the water infrastructure surrounding the PPC land, two pipes, a 315 PE and 180 PE, are located in Totara Road.

Water Acumen has undertaken a detailed capacity assessment of the existing water network, as outlined in the water section of their report. Based on their calculations, the existing Whenuapai development was determined to have approximately 1,200 dwellings using the existing water network. When factoring in the approximately 430 dwellings anticipated to be enabled if the proposed rezoning occurs, the existing water network has surplus capacity within the supply mains.

However, it is also noted by Water Acumen that upgrades of the surrounding water network will need to occur in order to facilitate future development enabled by the PPC. A portion of the 150 mm AC pipe at the intersection of Hobsonville Road and Brigham Creek Road would need to be upgraded and will be at the developer's expense if not upgraded by others. A new water main

has been installed along Fred Taylor Drive and would require commissioning to increase capacity, if not already commissioned.

In addition, a 315 pipe would be installed to replace the existing 150 AC water main along Totara Road in combination with cross connection to the 180 pipe in Totara Road and the 125 pipe in McCaw Avenue. In combination with the required upgrades, the installation of the 315 pipe would remove the network constraint and enable the servicing of the wider area. The local reticulation within the PPC land would be developed at the resource consent stage and will be constructed in accordance with best practice documents.

Overall, Water Acumen considers that based on the above upgrades and infrastructure being undertaken, the PPC can be adequately serviced for potable water connections.

11.4.3 Stormwater

There is no existing stormwater infrastructure on the PPC land and drainage is primarily by way of overland flow paths conforming to the natural contours of the site. Several small culverts are present under Totara Road near the PPC land. The existing and proposed stormwater catchments for the PPC land flow into the Ratarua Stream to the west of Totara Road and into the Rarawaru Creek to the east. The two streams then discharge into the upper reaches of the Waitematā Harbour.

To support the proposed rezoning of the land, a SMP has been prepared by NCL, which outlines the stormwater management principles used and how the PPC will meet the SMAF 1 requirements of the AUP, and the NDC.

The stormwater principles proposed as part of the PPC are based on the requirements of Auckland Council document GD04 “Water Sensitive Design for Stormwater”. Water sensitive design incorporates a set of principles for land development to reduce or minimise negative effects on the environment. Stormwater management is designed to achieve the greatest benefit, both for the community and the land developer. The SMP identifies that stormwater will be managed and guided on the PPC land by the following principles in accordance with the AUP and the NDC for greenfield sites:

- *“The primary stormwater network shall accommodate the runoff from the 10% AEP storm event for the proposed Maximum Probable Development scenario for the site with climate change accounted for.*
- *Stream hydrology: AUP SMAF 1 mitigation will be required for all areas discharging to streams to limit stream erosion by:*

- *providing retention (volume reduction) of at least 5mm runoff depth for all new impervious areas for which hydrology mitigation is required.*
- *providing detention (temporary storage) and a drain down period of 24 hours for the difference between the predevelopment and post development runoff volumes from the 95th percentile, 24-hour rainfall event minus the 5 mm retention volume.*
- *Stormwater quality treatment to remove contaminants shall be provided to the runoff from all new impervious surfaces (excluding inert roofing) for the 90th percentile rainfall event in accordance with the methods of GD01, unless otherwise mitigated or impracticable.*
- *Full or partial peak flow attenuation, as required, for the 10% and 1% AEP runoff in accordance with the AUP and SWCoP to manage overland flow paths and existing streams to prevent flooding of buildings.*
- *Management of overland flow paths on roads to meet Auckland Transport TDM requirements.”*

The above aspects will ensure that adverse stormwater effects can be appropriately managed on site to minimise and avoid adverse effects on to the surrounding area. A key aspect of the stormwater management for the site is the creation of two stormwater basins to assist with providing detention and attenuation of stormwater runoff. The stormwater basins will be developed as part of future resource consent applications and will not have standing water to avoid birds roosting in the area.

Due to the receiving environment for runoff from the site being the upper reaches of the Waitematā Harbour via the Ratara and Rarawaru streams, water sensitive designs have been adopted to maintain and enhance the quality of water discharged from future development enabled by the PPC. A combination of rain gardens within the internal road networks, catchpits, inert roofing materials, riparian planting, and stream daylighting, and other bioretention devices will be implemented to maintain water quality.

Overall, NCL makes the following conclusions:

“The proposal for the Whenuapai Green Plan Change will provide a zoning to allow up to 430 residential houses as part of a comprehensive consent for development of terrace units, duplex units, and standalone houses. The total site area is 16.36 hectares. The new zoning will allow for a residential subdivision which will provide all the required infrastructure to serve the development, including roading, water supply, wastewater, stormwater drainage and other private utility services such as power and telecoms.

The stormwater management principles proposed for this PCA will provide for effective control of the increased runoff arising from the change in impervious areas. This will include on-site retention providing for the re-use of rainwater, along with detention to limit downstream stream erosion.

Following the issue of resource consents, two stormwater dry basins will be constructed to provide the detention and attenuation of larger flood flows thus minimising increases in downstream flooding. SW basins will not have standing water to avoid encouragement of bird roosting in the area, as this is not compatible with flight operations on the adjacent NZDF airbase. Treatment of runoff from high contaminant generation activities will be provided in SW basins and raingardens where required. The stormwater basins will also provide amenity with extensive planting as well as paths for passive recreation.

All the existing permanent or intermittent streams will be retained within the proposed drainage reserves which will vest to Auckland Council on issue of titles. Riparian margins of at least 10m will be replanted. These works will further contribute to the long-term water quality of the streams and their riparian habitat.”

It is therefore considered that the proposed stormwater strategy for the PPC land will appropriately avoid, manage or mitigate adverse effects on to the receiving environment.

11.4.4 Earthworks Effects

No existing bulk earthwork consents apply to the PPC land. The existing PPC land has a gentle slope from the south to north with an average slope of 1.5%, with a low point located on the western boundary adjacent to Totara Road to which the larger part of the PPC land drains. Future earthworks will be required over the majority of the PPC land to establish roads, building platforms and stormwater management.

NCL outlines that a balanced cut/fill approach will be taken if possible and sediment and erosion controls to sufficiently mitigate the effects of stormwater runoff on the adjacent streams and downstream environment receiving environment will be implemented during any future earthworks' operations. All future works will be undertaken in accordance with Auckland Council GD05 'Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region.' Furthermore, any future earthworks undertaken on the PPC land will require resource consent and will implement the appropriate conditions to effectively manage and mitigate any adverse effects. Any future earthworks in the riparian areas on the PPC land will also require consent and will be subject to further assessment.

It is therefore considered that all future earthworks to accommodate future residential development can be effectively managed at the resource consent stage and will have less than minor adverse effects.

11.5 Flooding Effects

A comprehensive flood assessment has been undertaken by NCL for the PPC and is provided in **Appendix J**. The assessment outlines the existing flood hazards present, the impact of the PPC on flood hazards and the mitigation measures proposed to ensure any adverse flooding effects sufficiently mitigated and managed to an acceptable level.

As detailed by NCL, existing overland flow paths are present on the western side of the PPC land and discharge from the PPC land through a 450 mm diameter culvert under Totara Road, that in turn discharges into the upper end of a tributary of the Ratarua Stream. On the eastern side of the PPC land, several small overland flow paths discharge to the Rarawaru Creek or tributaries.

The extent of flooding is contained to areas adjacent to the existing streams and overland flow paths through the PPC land, being primarily to a small area on the western side of the PPC land where flows exit via the existing culvert under Totara Road. In regard to the surrounding area, flooding occurs on Totara Road on the western side of the PPC land adjacent to 129 Totara Road, where there is a sag in the road, along with flooded areas on the properties at 125 & 129 Totara Road. To the northeast of the site, a larger area of flooding attributed to Rarawaru Creek is present.

To ensure the PPC can suitably manage any adverse flood effects, it is proposed that the primary stormwater network shall accommodate the runoff from the 10% AEP storm event for the Maximum Probable Development scenario with climate change accounted for (3.8 degree increase). A Hydraulic Modelling Report has been prepared to support the PPC and covers the proposed development, flood modelling used, and the downstream environment in detail. The report shows that the proposed future development enabled by the PPC will not be subject to flooding and additional stormwater runoff resulting from an increase in impervious areas, and can be effectively managed to minimise the effects on streams and downstream areas to an acceptable level. Any increases in flood volumes will be attenuated sufficiently to prevent any significant increase in the potential flooding of neighbouring properties.

Furthermore, as part of future development of the PPC land if it is rezoned, stormwater dry basins will be created that will be designed to provide detention and 24-hour release of the runoff for the 95th percentile detention volume, in addition to attenuation of the runoff from the 10% AEP and partial attenuation of the 1% AEP rainfall events. In respect of a culvert under Totara Road to the north-east of the PPC land, the mitigation proposed as part of the PPC will reduce the flood water level in this area when compared to the pre-development situation. The dwelling and outbuildings located at 94 Totara Road are above flood levels, with only the minor

dwelling being below flood levels, although this situation would exist irrespective of whether the PPC land is developed or not.

In respect of overland flow paths that traverse through the PPC land, these will be conveyed via the future internal road network into stormwater basins. The road cross sections will be designed so that the overland flow paths meet Auckland Transport requirements and will have suitably placed catchpits connected to the future stormwater management system to manage overland flows within the road. Floor levels of all adjacent buildings will meet all requirements of the TDM, AC SWCoP & GD13, AUP E36 and the Building Code E1. The proposed attenuation of flood flows generated by the PPC will ensure that downstream properties will not be subject to flooding due to increased runoff.

Overall, it is considered that adverse flooding effects generated by the PPC can be avoided, managed, or mitigated to an acceptable level.

11.6 Acoustic Effects

An acoustic assessment has been prepared by Earcon Acoustics to support the PPC and is provided in **Appendix K**. As highlighted previously in this report, the PPC land is located adjacent to the RNZAF Base Auckland. The Base is operational and carries out a number of functions that are protected by designations and other planning controls. These designations and controls place additional restrictions on what activities can be established on the land.

The report prepared by Earcon provides an acoustic assessment of potential noise effects that can be received and generated by activities that would be enabled by the proposed zoning. The report also considers the compliance with the relevant regulations and consideration of effects in regard to the neighbouring RNZAF Base Auckland, such as reverse sensitivity and amenity.

Regarding the Whenuapai Airbase Aircraft Noise Overlay, the overlay is limited to the northern point of the PPC land (as shown by **Figure 23** below) and the 55dBA noise contour line.

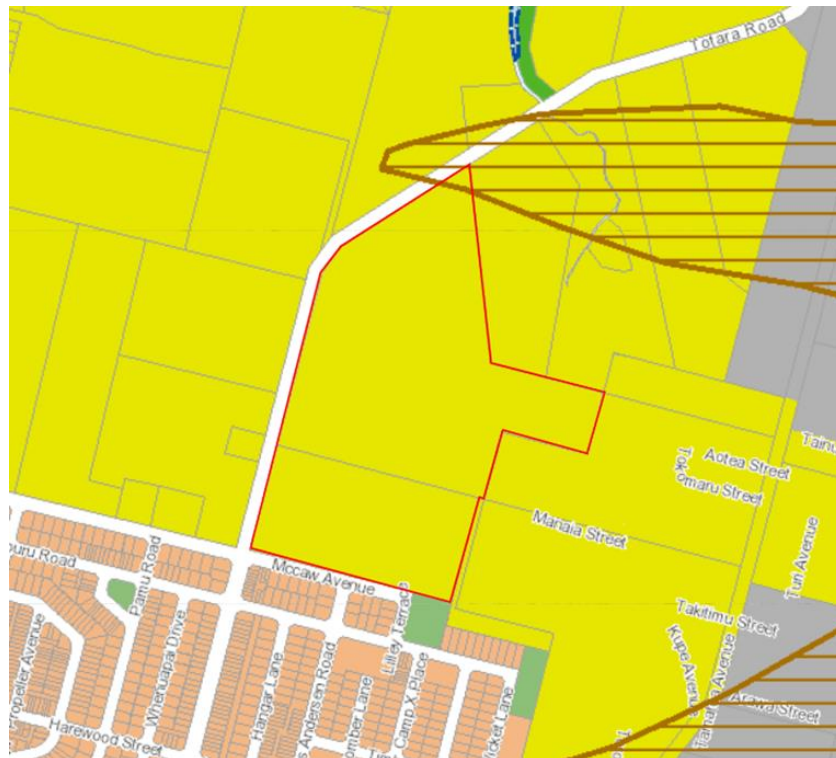


Figure 23 - Aircraft Noise Overlay in relation to the PPC land

The main sources of noise received by the PPC land are associated with aircraft operations, as summarised by Earcon below:

- Normal flight operations
- Emergency flight operations
- Ground based engine testing

The characteristics of each noise source are detailed in Earcon’s report and a detailed assessment provided. The assessment approach taken focuses on amenity outcomes rather than compliance with the applicable standards. This assessment approach and the outcomes are summarised by Earcon below:

- *“Normal aircraft operations (take-off, landing and taxiing):*
 - *Compliance: internal noise limit of 40dBA Ldn applies as per AUP noise contours.*
 - *Effects: Ldn as a descriptor is well suited for normal flight operations.*
- *Emergency aircraft operations (take-off, landing and taxiing):*
 - *Compliance: None required for emergencies.*
 - *Effects: Disregarded for emergencies.*
- *Engine Testing*
 - *Compliance: This is associated with the Ldn engine testing noise contours against internal noise levels of 40dBA Ldn. Any buildings proposed within the Ldn*

57dB contour would likely only need to have mechanical ventilation to comply with the internal noise limit.

- *Effects: Ldn is not a sufficient measure to assess amenity or effects from engine testing. Use of external LAeq levels during tests is recommended. A number of mitigation measures should be considered to manage effects.”*

This assessment then informed the following recommendations in the context of a regulatory framework for protection of amenity of future occupants and protection of the RNZAF Base Auckland from reverse sensitivity:

- *“All titles and any associated tenancy agreements within the subject site to include a no-complaints covenant for the benefit of RNZAF covering all operations.*
- *Buildings containing activities sensitive to noise must be constructed to achieve the following internal noise levels in habitable spaces:*
 - *Living Areas: LAeq(15 mins) 45dB*
 - *Work Areas: LAeq(15 mins) 45dB*
 - *Sleeping Areas (night-time) LAeq(15 mins) 40dB*
- *The above internal noise limits can be achieved by either:*
 - *Use of building materials for the building envelope from a schedule’ or*
 - *The design should be certified by a suitably qualified and experienced person.*
- *Building envelope attenuation should be based on external LAeq(15minute) noise contours representative of high noise engine tests.*
- *Where a development plan comprises a wider sub-division, external noise levels for design purposed may be adjusted to reflect the site plan.”*

We adopt the findings of Earcon’s assessment and have incorporated the recommendations into the proposed Precinct provisions and Precinct Plans to ensure a sufficient level of on-site amenity is achieved and to safeguard the operations of the RNZAF Base Auckland. It is therefore considered that any adverse acoustic effects can be appropriately mitigated by the provisions proposed and will ensure that a sufficient level of amenity is provided both on the site and for the RNZAF Base Auckland.

11.7 Land Stability and Geotechnical Effects

A Geotechnical Investigation Report has been prepared by GMW Geosciences to support the PPC and is provided in **Appendix L**. The report details the findings of the investigation and assesses the suitability of the land for the proposed change in land use in regard to stability and the underlying characteristics of the land.

The assessment concludes that the site is suitable for future development enabled by the PPC, subject to the recommendations outlined in the report being adhered to by future site works and subsequent development. In addition, any mitigation required has been outlined in the geohazard assessment table within report and will guide any future development of the land enabled by the PPC.

Overall, it is considered that there are no geotechnical constraints that would inhibit the proposed change in land use from occurring or suggest that the land is unsuitable for future development works, such as infrastructure, subdivision and building platforms. Therefore, any adverse effects will be sufficiently avoided, managed, or mitigated.

11.8 Archaeological Effects

An archaeological assessment has been undertaken by Clough & Associates Ltd and is provided in **Appendix M**. The report outlines in detail the history of the PPC land and the wider Whenuapai area. Field surveys and an archaeological desktop analysis were undertaken to determine whether any archaeological sites are present within the PPC land. The report also discussed the scheduled extent of place of the RNZAF Officers' Mess which extends into the PPC land and that it is appropriate for the extent of place to be reduced to not extend onto the PPC land. The report made the following conclusions:

“Future development enabled by the proposed plan change will have no known effects on archaeological values, as no archaeological sites have been identified within the plan change area and the potential for any unidentified subsurface archaeological sites to be present is very low.

The scheduled extent of place of the RNZAF Officers' Mess on neighbouring Ministry of Defence land extends marginally into the proposed plan change area. However, the scheduled building is set well back from the property boundary and for the most part is well screened from the plan change area by mature trees. Future development enabled by the proposed plan change would not have any adverse physical effects on the scheduled item, and any visual effects could be mitigated by additional screen planting along the property boundary.”

Based on the above conclusion, it is considered that the PPC will have no effects on any known archaeological values as no archaeological sites have been identified within the property boundaries. Nevertheless, in the extremely unlikely event that unrecorded subsurface remains are discovered during future development, Accidental Discovery protocols, as outlined in the AUP, will apply and all works within 20 m of the discovery will be required to cease. Furthermore, the assessment also concluded that an authority under Heritage New Zealand Pouhere Taonga Act 2014 would not be required for the PPC due to no known archaeological sites being present.

As noted previously, the scheduled extent of place of the RNZAF Officers' Mess extends marginally into the PPC land by a maximum of 5 m and is proposed to be removed from the PPC land as part of the PPC. Clough & Associates also note that the origin of the extent of place extending over the PPC land is unclear as it was never part of the Ministry of Defence properties and may have been a minor mapping error, which could be adjusted to align with the property boundary without detriment to the scheduled item.

Regardless of the reasoning behind the scheduled extent of place extending on to the PPC land, the reduction in the extent of place that encroaches on to the PPC land is supported by Clough & Associates as the physical Officers' Mess building is not located within the PPC land and is approximately 82 m away from the eastern boundary of the PPC land. In addition, future planting along the boundaries to the north and southwest of the scheduled extent of place would sufficiently mitigate any visual effects and appropriately screen any future dwellings.

It is therefore considered that the PPC will have no known effects on archaeological values as the PPC land has no history of containing archaeological sites nor were any discovered during site investigations. The potential for any unrecorded subsurface remains to be discovered during future development is very low and in the rare event a discovery is made, it can be appropriately managed via Accidental Discovery protocols. Furthermore, the reduction in the scheduled extent of place for the Officers' Mess building that encroaches into the PPC land is considered to be acceptable because of the physical distance between the Officers' Mess and the boundary of the PPC land. The small reduction in extent of place will not inhibit the ongoing protection of the physical Officers' Mess building.

11.9 Urban Design Effects

Urban Acumen has been commissioned by NCL to prepare an Urban Design assessment and the report is provided in **Appendix N**. The report provides an assessment of the potential urban design related effects for the PPC land under the proposed MHU zone and associated precinct provisions. The urban design report outlines the proposal for rezoning the PPC land from FUZ to MHU, the effect of the proposed precinct provisions, and what effects future development may have on the existing area.

A description of the surrounding strategic and local context of the area is contained within the urban design assessment and is described in earlier sections of this report. The assessment discusses the suitability of the PPC land for the proposed MHU zoning and subsequent future development and notes the following:

- *“The site is generally within a walkable catchment which supports the existing neighbourhood centre and the zoned/developing local centre;*
- *It is a logical extension of the existing residential environment which is also zoned MHU;*

- *It provides for a mix of housing types including detached dwellings, duplexes and low rise apartments (up to three storeys);*
- *It aligns with the developing market and provides for both comprehensively developed sites and houses as well as “vacant lots” with a minimum site size of 300m² ;*
- *It provides for built form that is consistent with the existing and developing residential character in Whenuapai which is characterised by two and three storey dwellings in either detached, duplexed or terraced form”*

Urban Acumen goes on to outline the location of the PPC land and the opportunities provided for residential development in the area. The proposed MHU zone is appropriate for the PPC land as it is a logical extension of the existing residential environment to the south (also zoned MHU zone), is within a walkable catchment that is supported by the existing neighbourhood centre and the proposed precinct provisions will protect residential amenity in regard to the existing surrounding uses, such as the airbase. Furthermore, the report highlights that the proposed MHU zoning is consistent with the WSP which anticipates medium density residential uses to be developed on the PPC land. This is summarised by Urban Acumen below:

“In summary, the Mixed Housing Zone provides the “right density in the right place” and balances land and infrastructure utilisation with the local context and likely market conditions and preferences. It is also consistent with the Whenuapai Structure Plan, which indicates the plan change site as “medium density”. This zoning is also considered to be consistent with the direction of the NPS:UD and Chapter B of the AUP, particularly given:

- *it provides for housing choice appropriate to the location*
- *enables a higher residential density that a Mixed Housing Suburban Zoning (notably through building height) close to a local centre and bus route*
- *is flexible and can respond to market changes/trends*
- *ensures on-site residential amenity outcomes through a combination of current zone development standards and proposed precinct provisions”*

Furthermore, the urban design assessment highlights that the proposed precinct plan and provisions appropriately respond to the plan change land interface with surrounding land uses and provides for a built form consistent with the existing land uses. In regard to the NZDF land, the assessment notes that a zoning response is not considered necessary nor a greater yard setback.

Whilst it is acknowledged that land to the west of the PPC land is of a more rural nature than the remaining adjoining land, it is zoned FUZ and therefore is anticipated to be urbanised in the future and will further change the area to a more urban form. In addition, the PPC will provide sufficient permeability with the existing road network through the roading upgrades and pedestrian/cycle links proposed.

Urban Acumen concludes with the following:

“The proposed rezoning and precinct planning process has recognised urban design analysis and recommendations and, through assessment against a set of principles/outcomes has been shown to be consistent with best practice urban design. It is also considered to:

- *Be a logical extension of the existing urban area, an appropriate land use and a contribution to compact urban form;*
- *Make provision for future extension/connectivity;*
- *Be well connected both locally to the Whenuapai town centre and further afield;*
- *Respond to the site’s unique opportunities and constraints;*
- *Make good use of land within a walkable catchment of local services and facilities; including public transport;*
- *Enable a mix of housing with good amenity and a focus around a neighbourhood park; and*
- *Appropriately manage the site’s interfaces with the existing residential environment and Whenuapai Airbase; and*
- *Be consistent with the high level direction with respect to urban design, particularly the Whenuapai Structure Plan (2016).*

As such, it is supported from an urban design perspective.”

It is therefore considered that the proposed zoning, Precinct Plan, and associated provisions are sufficient in providing a future land use management framework that will appropriately manage effects that arise from future development enabled by the PPC.

11.10 Character and Visual Amenity Effects

A Landscape Visual Assessment has been prepared by LA4 Landscape Architects to support the PPC and the report is provided in **Appendix O**. The report provides a detailed assessment of the likely landscape and visual effects of the development enabled by the proposed PPC. The assessment takes into account the existing character of the PPC land, as well as the surrounding environment, and identifies the key landscape and visual features of the PPC land to determine the visual and landscape effects of the proposal on to the surrounding environment.

The report provides a detailed assessment of both the PPC land and the surrounding environment and makes the following assessment of the existing landscape character:

“Although there are some localised areas within wider Whenuapai that retain a relatively high level of rural, and, or general landscape amenity, apart from sections of the coastline, the landscape values and sensitivity is generally relatively low. This is a consequence of the level of modification to the rural environment, which has in many

instances been degraded by land use practices, retains limited significant indigenous vegetation, and generally exhibits few particularly distinctive rural characteristics, or significant landscape features.”

As stated above, whilst some pockets of rural amenity may still be present, the overall landscape character of the area where the PPC is located is low and is a highly modified environment that does not contain any unique landscape features. The highly modified nature of the PPC land is further expanded on by LA4 below:

“Based on the preceding description and analysis of the site and surrounds it is clear that there are relatively low landscape values and sensitivity associated with the site. The site is a relatively degraded, highly modified environment lacking significant landscape values, in close proximity to existing residential areas and RNZAF Base. Therefore, the only negative outcomes in landscape terms would be the loss of the remaining semi-rural character, which is anticipated by the relevant AUP planning strategies and current FUZ zoning that applies to the site. Development enabled by the PPC would result in a change in landscape character, but would ensure a suitable level of amenity, albeit an urban, rather than a semi-rural character is achieved.”

Based on the above, the PPC land is located in area that is undergoing or has already undergone a shift away from a rural character to a character more associated with urban areas. This is evident from the degraded and highly modified nature of the PPC land and the recent development of the surrounding area, particularly the recent medium-density residential development to the south of the PPC land. Whilst LA4 does note that the character of the PPC land and surrounds will evidently shift if the PPC land is developed for residential purposes, this is a change that is anticipated by the planning framework. A suitable level of amenity will still be achieved through the MHU zone provisions, in combination with the bespoke precinct provisions to effectively manage adverse visual effects.

The visual effects assessment outlines the response the changes to the landscape may have in relation to visual amenity or people’s visual appreciation of the surrounding landscape. The assessment focuses on the following:

- Adjoining properties
- Wider surrounding area
- Surrounding roads

LA4 notes that whilst the adjacent properties to the PPC land would be most affected by any future development enabled by the PPC in comparison to the wider surrounding area and surrounding road network, any adverse visual amenity effects would be moderate as they are anticipated through the FUZ of the PPC land, and the land being identified as suitable for development under the WSP. In addition, it is considered that landscape effects must be

assessed against the existing environment and the outcomes sought in the relevant statutory provisions; in this case the FUZ of the PPC land and the WSP, among other strategies, that have identified the land as suitable for residential development.

In regard to the wider surrounding area, LA4 considers that whilst future development enabled by the PPC would be visible from parts of the wider surrounding area, that the adverse visual effects would be low to very low and entirely acceptable within the context of the existing and planned future urban environment. Any future development would integrate with the surrounding area due to the scale of the proposal relative to the site context and appearance and visual compatibility with existing development in the surrounding area, such as the medium-density residential development to the south and the RNZAF Base Auckland.

Whilst LA4 acknowledges that there will be some level of exposure of future development enabled by the PPC on to road users who live locally, general road users the effects will be of far less significance as future development will be seen as part of the pattern of land use change occurring locally in the Whenuapai area and as anticipated by the surrounding FUZ land. Furthermore, any effects on local road users will be further minimised by future development enabled by the PPC being gradual and undertaken over a number of years. Overall, the adverse visual effects from the surrounding road network would be low.

LA4 makes the following conclusions:

“While development enabled by the PPC would result in a significant visual change from the site’s current open semi-rural state to one with urban characteristics, particularly for some of the immediate neighbours, such visual change is anticipated and is in accordance with the key planning initiatives for the area both within the AUP and WSP.

Development enabled by the PPC would initially generate landscape and visual effects of some significance. These however are inevitable with urban development at the start of a process of urbanisation. In addition, the visual effects of the development of the site apparent from the early stages would decrease over time as street tree plantings and landscape plantings typically associated with the urbanisation of an area become established.

In conclusion, development enabled by the PPC would fulfil the need for residential and urban intensification and provide an opportunity for an innovative and environmentally sustainable urban development. The PPC would be largely consistent with the regional growth strategies for the area and would result in a high-quality urban development.

Overall, I consider that in the context of the established environment the proposal could be visually accommodated without adversely affecting the character, aesthetic value and integrity of the surrounding environment.”

We adopt this assessment and therefore consider that any adverse landscape and visual effects arising from the PPC can be sufficiently managed and mitigated.

11.11 Effects on Mana Whenua

A summary of the consultation undertaken with Mana Whenua is provided in **Appendix F**. To summarise, the applicant has contacted and engaged with the below Mana Whenua groups that hold an interest in the area where the PPC land is located:

- Te Kawerau ā Maki
- Ngāti Manuhiri
- Ngāti Maru
- Ngāti Paoa Trust and Trust Board
- Ngāti Te Ata
- Ngāti Whātua o Kaipara
- Ngāti Whātua o Ōrākei Trust Board
- Te Rūnanga o Ngāti Whātua
- Te Ākitai Waiohua

Of the above Mana Whenua groups, responses from Ngāti Manuhiri (deferred to Te Kawerau ā Maki) and Te Kawerau ā Maki were received.

As outlined in the consultation summary, a new Cultural Impact Assessment ('CIA') is not required for the PPC due to Te Kawerau ā Maki involvement with previous development on the land (the Whenuapai Green Fast Track Application), and the CIA prepared for the previous fast track resource consent application can be repurposed for this PPC request. The CIA prepared for the previous fast track application is provided in **Appendix P**.

Te Kawerau ā Maki did express their preference to be engaged in the development of the Precinct Provisions to ensure the cultural context of the land and surrounding area is incorporated into the PPC. The applicant is committed to ongoing engagement with Te Kawerau ā Maki and have collaborated with them for the development of the Precinct Provisions and will continue to involve them in future development enabled by the PPC.

As detailed in the CIA prepared for the previous fast track consent application, Te Kawerau ā Maki made the following conclusion:

“The site sits on relatively productive soils within a cultural landscape focused on coastal settlements and resource extraction around the upper Waitematā harbour. The site is in very close proximity to Te Rarawaru historic kāinga site and the Rarawaru, Waionoke, and Ratara streams. A total of five impacts are noted in relation to the development (not including individual potential animal impacts which are not covered in this report), most

of which could be minor to moderate beneficial (one would be negligible adverse) if mitigations discussed are incorporated, which would be a net benefit from a cultural perspective. Without mitigation minor (but not less than minor) adverse cultural effects would occur. Mitigations include a mixture of stream restoration, native planting, stormwater treatment, and placenaming/interpretation.”

On this basis, Te Kawerau ā Maki did not oppose the previously proposed development but sought the following recommendations in order to endorse it:

- 1. The adoption of 100% native eco-sourced plantings for all streetscape, reserve or public spaces within the development.*
- 2. The adoption of a combination of tree pits, vegetated swales, proprietary devices or other methods such as to develop a secondary or tertiary (three-step) stormwater treatment process for the development.*
- 3. Stream restoration (including in order of preference daylighting/use of bridge/decently sized culvert with fish passage design) within the property footprint including riparian planting.*
- 4. That the developer encourages neighbouring properties to undertake stream restoration works, and, where possible, coordinate efforts for a net positive outcome.*
- 5. Retain or reinter cut soils within the Site as much as possible, including through landscaping or other means.*
- 6. Work with TKaM on incorporating our wāhi tohu and history into the development through things like street naming, park/reserve naming, and naming the new school*

Whilst it is acknowledged that the recommendations made were on the basis of a resource consent application, which requires a considerably greater level of detail than a PPC, the applicant has strived to include many of the recommendations in the PPC or will provide for the recommendations as part of future development enabled by the PPC.

The proposed Precinct provisions address numerous recommendations, such as the use of native species for enhancement planting across the PPC land. The applicant will ensure native plants are eco-sourced where possible. The SMP prepared for the PPC and incorporated into the Precinct Provisions provides for a range of stormwater management tools, such as bioretention swales, rain gardens and rainwater tanks to ensure stormwater runoff is sufficiently treated before being released. The identified riparian and wetland areas on the land will be restored and enhanced from their current degraded state via riparian setbacks and extensive planting to greatly improve the mauri of the waterways.

Future works, such as earthworks, street naming and park/reserve naming that do not form part of the PPC request, will be addressed by future resource consent applications and the applicant will continue to work and engage with Te Kawerau ā Maki on these aspects.

It is therefore considered that the applicant has demonstrated its ongoing commitment to consult with iwi and welcomes further collaboration as the PPC progresses.

11.11.1 Iwi Management Plan

The PPC land is located in the rohe of Te Kawerau ā Maki. The Te Kawerau ā Maki Resource Management Statement was prepared in 1995 and is the Iwi Management Plan ('IMP') for Te Kawerau ā Maki for achieving the purposes of the RMA. To the best of our knowledge, it is the only IMP lodged with Council by a relevant iwi.

The IMP outlines the continuing role of Te Kawerau ā Maki as Kaitiaki (guardians) and provides policies to guide statutory authorities and applicants. A high-level summary of the IMP key policies is provided below:

- The objective and policies within section 2 show how Te Kawerau ā Maki will meet their responsibilities as Kaitiaki by promoting the sustainable management of the environment in accordance with tikanga (Policy 2.2(2)) and requires engagement with all relevant agencies within the rohe to ensure their role as Kaitiaki is given effect to (Policy 2.2(3)).
- Section 3 outlines the process that should be followed for resource consent applications within the rohe.
- Section 4 focuses on advocating for and providing for the social, economic, and cultural well-being of Te Kawerau (Objective 4.1.1) by working with agencies involved in resource management (Policy 4.1.2(2)) and by ensuring that cumulative effects upon Te Kawerau ā Maki are recognised and provided for (Policy 4.1.2(3)).
- The policies contained under section 4.2.2 concern Te Kawerau ā Maki cultural heritage and require the appropriate protections and controls to be established on all heritage sites (Policy 4.2.2(1)), the involvement of Te Kawerau ā Maki in all scenarios where effects may be generated (Policy 4.2.2(2)) and the recognition of Te Kawerau ā Maki spiritual and cultural values (Policy 4.2.2(3) & (4)).
- Section 4.3 outlines Te Kawerau ā Maki responsibility as Kaitiaki in the reburial of kōiwi and protection of artefacts (Objective 4.3.1).

- Section 4.4 outlines the management of water to protect the mauri of all natural waterways and to enhance their life supporting capacity by managing the effects of development on the awa. This is recognised by the policies under section 4.4.2 which outline that spiritual and cultural concepts are recognised as key issues in water management.
- Section 4.5 concerns the Coastal Marine Area and that Te Kawerau ā Maki as Kaitiaki ensure the protection, enhancement, and appropriate use of the CMA (Objective 4.5.1) and the policies contained under section 4.5.2 outline how activities in the CMA should be managed.
- Waste management is addressed in section 4.6, which promotes the disposal of waste water and storm water through land (Policy 4.6.2(2)) and working with local authorities/agencies to ensure that places of cultural and spiritual values are not affected by disposal (Policy 4.6.2(4)).
- Section 4.7 states that Te Kawerau ā Maki role as Kaitiaki needs to address the management and protection of the land and landscape (Objective 4.7.1) by working with the relevant statutory authorities (Policy 4.7.2(2), promoting the sustainable management of land, flora and fauna, and natural waterways (Policy 4.7.2(4) & (5)), and by seeking a balance between development and the protecting the values of the land (Policy 4.7.2(6)).
- The management of flora and fauna is outlined in section 4.8, which includes Te Kawerau ā Maki support for eradicating exotic plants and acknowledges their opposition to the destruction of native flora and fauna without Te Kawerau ā Maki permission. Section 4.9 outlines Te Kawerau ā Maki participation in design of the built environment and interpretation of heritage.

The IMP also outlines Te Kawerau ā Maki support and adoption of the 1993 Mataatua Declaration on cultural and intellectual property rights of indigenous peoples.

The IMP has been considered as part of the PPC and it is considered that the PPC aligns with the IMP in many aspects. The PPC includes site-specific Precinct Provisions to ensure that all future development is undertaken in accordance with the Stormwater Management Plan, wastewater is appropriately managed, and waterways are protected and enhanced.

Whilst the PPC land does not contain any known sites of cultural significance, it is acknowledged that this is an area that was actively settled by Mana Whenua and therefore, there is a possibility for discovery of features of significance to Mana Whenua. Any future development on the land enabled by the PPC will adhere to the best practice rules and standards upon any discoveries being made.

The PPC through its bespoke precinct provisions seeks to weave in principles of sustainability through the provision of open space, and pedestrian and cycle links. All riparian areas will be protected by setbacks and extensive native planting undertaken to support the mauri of the water bodies on the PPC land and the surrounds. The PPC land is also located close to public transport and a wider range of services that support residential development.

Overall, it is considered that the proposal has specifically addressed many aspects of Te Kawerau ā Maki IMP and seeks wherever possible to give effect to the outcomes sought under the plan. The applicant is committed to ongoing engagement with Mana Whenua on the Whenuapai Green PPC and acknowledges Mana Whenua’s relationship with the land and their role as Kaitiaki. It is considered that the PPC has and can be further developed to be consistent with the environmental outcomes sought by Te Kawerau ā Maki as expressed in the Te Kawerau ā Maki IMP.

11.12 Reverse Sensitivity Effects

As highlighted previously in this report, the RNZAF Base Auckland is located directly to the east of the PPC land and is currently used for military aviation and other related military activities. Due to the proximity of the PPC land to the Base, potential impacts, such as reverse sensitivity effects, and safety risk, such as bird strike, may be increased in relation to the operations of the Base.

To ensure any potential effects are adequately managed, the applicant has engaged with NZDF and incorporated Precinct provisions that seek to address potential impacts on the day-to-day operations of the Base. The proposed provisions have been prepared following consultation with NZDF and are considered by the applicant and NZDF to be satisfactory to manage any potential effects on the Base. Provisions include additional control over the establishment of activities sensitive to aircraft noise on the PPC land and avoidance of stormwater ponds.

Furthermore, as outlined by the provided acoustic assessment, no-complaints covenants are also proposed to be registered on future titles to protect the ongoing operations and functions of the RNZAF Base Auckland. Based on the above, it is considered that the PPC provisions have addressed any reverse sensitivity effects associated with the RNZAF Base Auckland and will sufficiently mitigate any adverse reverse sensitivity effects.

11.13 Overall Environmental Effects Conclusion

Overall, it is considered that any adverse effects generated by the proposed development enabled by the PPC will not be significant and will be satisfactorily mitigated through the proposed Precinct provisions. In addition, it is considered that there will be numerous positive effects arising from the development enabled.

12.0 Consultation

In preparing the PPC, the applicant has commenced consultation and engagement with a number of parties including:

- Mana Whenua
- New Zealand Defence Force
- Auckland Council
- Auckland Transport
- Healthy Waters
- Watercare
- Neighbouring land owners

A summary of consultation undertaken to date is included in **Appendix F**. The appendix will continue to be updated as additional responses are received.

13.0 Conclusion

The PPC applicant is proposing to rezone 16.36 ha of land on Totara Road from Future Urban Zone to Residential – Mixed Housing Urban Zone and to apply the Whenuapai Green Precinct across the land. The proposed rezoning and establishment of a Precinct is considered to be the most appropriate means to achieve the purpose of the RMA. It is considered to be the optimal option for enabling the future development of the land and is in accordance with the vision and outcomes sought under key strategic documents, in addition to protecting existing uses and features that surround the land.

The PPC is considered to be consistent with higher order statutory plans and achieves the anticipated outcomes for the land. The PPC will enable medium density residential development consistent with the WSP, whilst also being consistent with many of the outcomes sought under the Auckland Plan 2050 and the ARPS, and utilising the pathway provided for a PPC under the FDS and demonstrating that the change in land use is appropriate. In addition, the s 32 evaluation confirms that the proposed Precinct approach and SMAF control is appropriate for the PPC land. As a result of the evaluation undertaken, it has been determined that enabling residential development through the proposed zoning in combination with the proposed Precinct provisions is more appropriate than the status quo, other spatial alternatives, or solely MHU zoning.

The proposal is considered to be consistent with the objectives and policies of the MHU zone, as well as the objectives and policies of the Auckland-wide chapters such as Natural Resources, Transportation, Environmental Risk and Subdivision of the AUP.

A detailed assessment of environmental effects that may be potentially generated by development enabled by the PPC has been undertaken. It is concluded that any adverse effects generated by the proposed development enabled by the PPC will be minor and sufficiently mitigated, in addition there being numerous positive social, cultural and environmental effects from the residential development enabled.

The assessment shows that the proposed objectives and policies for the Whenuapai Green Precinct are the most appropriate way to achieve the purpose of the RMA and contribute to the overall achievement of the RPS, in addition to the proposed new Precinct rules achieving the objectives and policies of the MHU zone.

It is therefore considered that the PPC is the most appropriate way of achieving the purpose of the RMA. It is recommended that the PPC be accepted for processing under Schedule 1 of the RMA as the PPC will enable efficient use of the land, whilst ensuring the surrounding uses are protected through the bespoke controls proposed to manage the interface between the PPC land and the surrounding environment.

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