



# Pilkington Park

Private Plan Change Request

167-173 Pilkington Road, Point England

Section 32 Assessment Report

24 August 2023

**B&A**

Urban & Environmental

Prepared for:

Wyborn Capital Investments Limited

B&A Reference:

18776

Status:

Final Revision 2.0

Date:

11 April 2024

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## 1.0 Applicant and Property Details

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To:	Auckland Council
Site Location:	167-173 Pilkington Road, Point England
Applicant Name:	Wyborn Capital Investments Limited
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Mellissa McGrath / Kasey Zhai
Plan Change Area:	Approximately 7.3 hectares
Unitary Plan:	Auckland Unitary Plan (Operative in Part) ('AUP')
AUP Zoning:	Business – Light Industry
Overlays	Natural Heritage: Regionally Significant Volcanic Viewshafts And Height Sensitive Areas Overlay - W12, Mount Wellington, Viewshafts Natural Heritage: Locally Significant Volcanic Viewshafts Overlay - W13, Mount Wellington
Designations	Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd
Additional Limitations	Overland flow paths
Locality Diagram:	Refer to <b>Figure 3</b>
Brief Description of Proposal:	Private plan change request to rezone 7.3 hectares of land at 167-173 Pilkington Road, Point England and approximately 600m <sup>2</sup> of land within RAILWAY LAND NIMT 671.04-672.38 KM from Business – Light Industry to Business – Mixed Use with associated precinct provisions.

## 2.0 Executive Summary

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Wyborn Capital Investment Limited is applying to Auckland Council for a plan change to the Auckland Unitary Plan – Operative in Part ('AUP') to rezone the land at 167-173 Pilkington Road, Point England from Business – Light Industry to Business – Mixed Use. The Plan Change proposal seeks to amend the planning maps to include height variation controls between 21m and 27m, and a precinct to manage site-specific matters, including the management of height in relation to boundary at the eastern boundary of the Plan Change area and reverse sensitivity effects to the adjacent railway corridor to the west.

The Plan Change is in keeping with the outcomes sought in the Auckland Plan and the Regional Policy Statement as it enables the efficient use of the Plan Change area and promotes quality intensification within a location which is accessible to public transport, open space and centres.

The Plan Change is also in keeping with the National Policy Statement on Urban Development 2020, which emphasises the need to allow for growth by enabling building heights of at least six storeys within a walkable catchment of existing rapid transit stop. The Plan Change area is located within walking distance of the Glen Innes Train Station, and is identified under proposed Plan Change 78 to the AUP to be within a walkable catchment.

Specialist urban design, transport, infrastructure and landscape and visual assessment reports that have been prepared for the Plan Change application confirm that the proposed plan change is appropriate in this location. The proposed precinct provisions, and existing zone and Auckland-wide provisions of the AUP will ensure that future development of the subject landholdings will achieve the higher-level objectives and policies of the Regional Policy Statement.

An evaluation in accordance with section 32 of the Resource Management Act 1991 ('RMA') has been undertaken and concludes that the proposed Plan Change will be an efficient and effective method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement.

On this basis, it is considered that the proposed zoning, building heights, and precinct provisions will provide for the most appropriate uses for the land.

## 3.0 Introduction

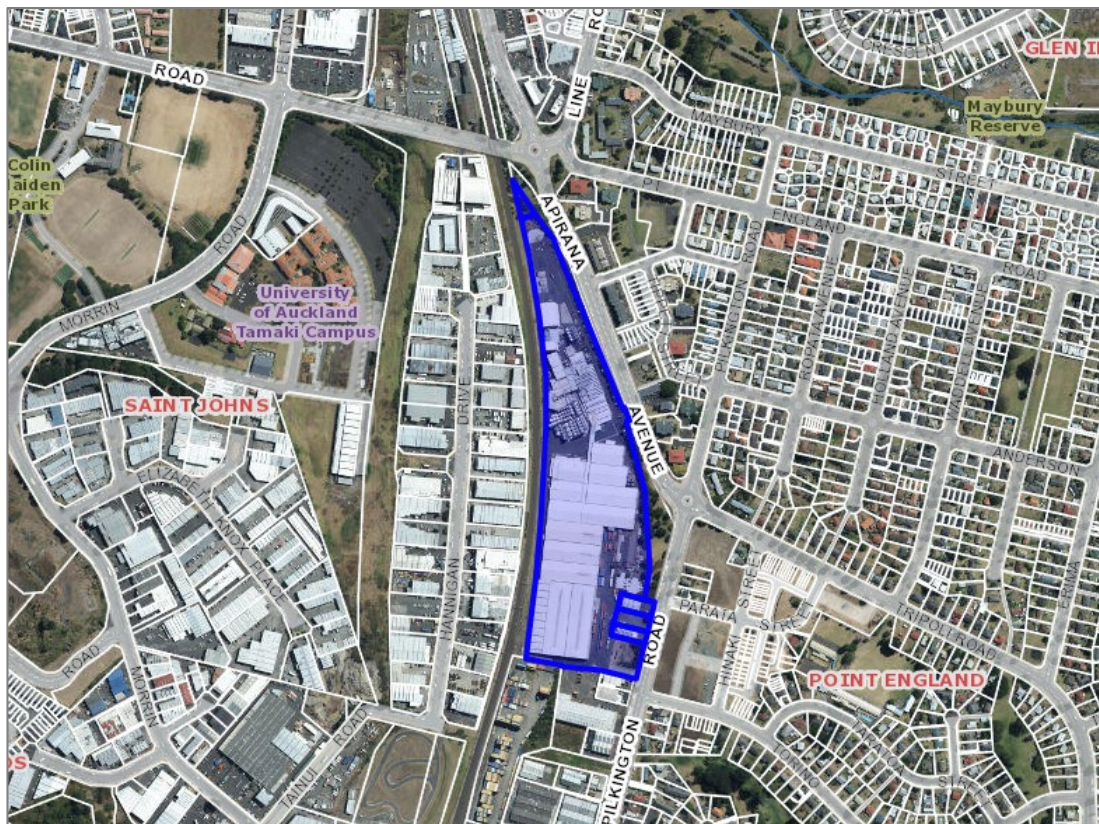
### 3.1 Background

Wyborn Capital Investment Limited (**‘Wyborn Capital’**) seeks to rezone approximately 7.3 hectares of land at 167-173 Pilkington Road, Point England from Business – Light Industry (**‘Light Industry’**) to Business – Mixed Use (**‘Mixed Use’**). The Plan Change also includes the rezoning of approximately 600m<sup>2</sup> of land within RAILWAY LAND NIMT 671.04-672.38 KM from Light Industry to Mixed Use. This land is excluded from the proposed precinct.

It is envisaged that the Plan Change will enable the efficient use of land with high levels of accessibility to existing amenities and public transport, and contribute to a quality compact urban form.

### 3.2 Site Location and Description

The Plan Change area consists of approximately 7.3 hectares of Light Industry zoned land at 167-173 Pilkington Road, and is bound by Apirana Avenue and Pilkington Road to the east and the railway corridor the west. An area of reserve approximately 3m wide is located between the Plan Change area and Apirana Avenue and Pilkington Road, and are identified as the Apirana Corner Reserve and Pilkington Apirana Road Reserve in Auckland Council Geomaps. A locality plan of the Plan Change area is shown in **Figure 1** below. Records of Title are included at **Appendix 1**.



**Figure 1: Aerial map showing the location of the Plan Change area and surrounding locality (source: Emaps).**

The Plan Change area is zoned Light Industry under the Auckland Unitary Plan (Operative in Part) (**‘AUP’**) and is subject to regionally and locally significant maunga viewshafts (W12, Mount

Wellington and W13, Mount Wellington). The viewshafts have a height of approximately 28m in the northern part of the site, decreasing to approximately 23.5m to the south.

The topography of the Plan Change area is predominantly flat. The area has been fully developed in impervious areas, and existing buildings accommodate a range of light industry and commercial activities, including warehousing and storage facilities, packing and distribution, manufacturing, and a childcare centre.

There are four existing vehicle crossings from Apirana Avenue and Pilkington Road. An overland flow path traverses the northern part of the Plan Change area in an east-west direction. There are no areas subject to the one per cent Annual Exceedance Probability floodplain.

### 3.3 Surrounding Area and Local Context

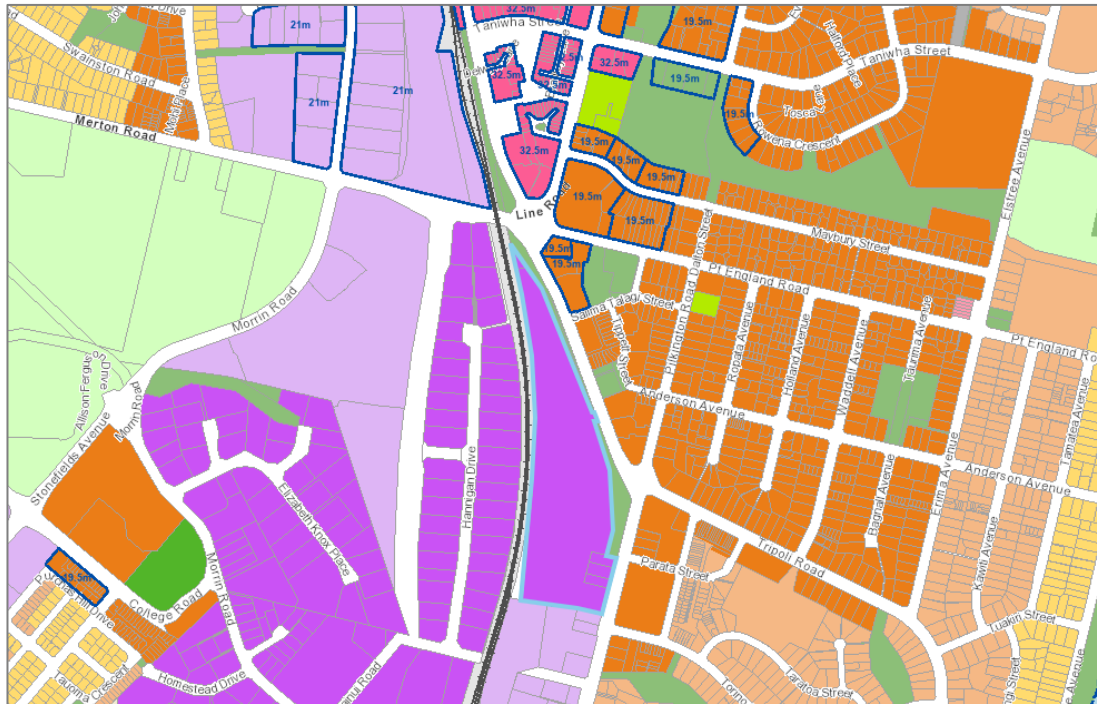
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Adjacent to the north of the Plan Change area is the Glen Innes Town Centre and Glen Innes Train Station. Existing amenities within the Town Centre include the Glen Innes Library, Glen Innes Community Hall, Te Oro Arts Centre, and a range of retail services, including food and beverage, a supermarket, and chemist.

Existing areas of open spaces include an unnamed park located on the opposite side of Apirana Avenue, Talbot Reserve located adjacent to the north east, and Colin Maiden Park located to the south west. Boundary West Reserve and Torino Reserve are also located on the opposite side of Pilkington Road and adjacent to the south west which connect to walking tracks along the Tamaki River.

The zoning pattern surrounding the Plan Change area is shown in **Figure 2** below, and includes the Glen Innes Town Centre to the north, Mixed Use zone immediately adjoining to the south, and both Residential – Terrace Housing and Apartment Buildings (**'THAB'**) and Residential – Mixed Housing Urban (**'MHU'**) zones to the east. Light Industry zoned land is located adjacent to the west of the railway corridor. Height Variation Controls (**'HVC'**) of up to 32.5m, 19.5m, and 21m apply to the Town Centre and immediately adjacent THAB and Mixed Use zones respectively.





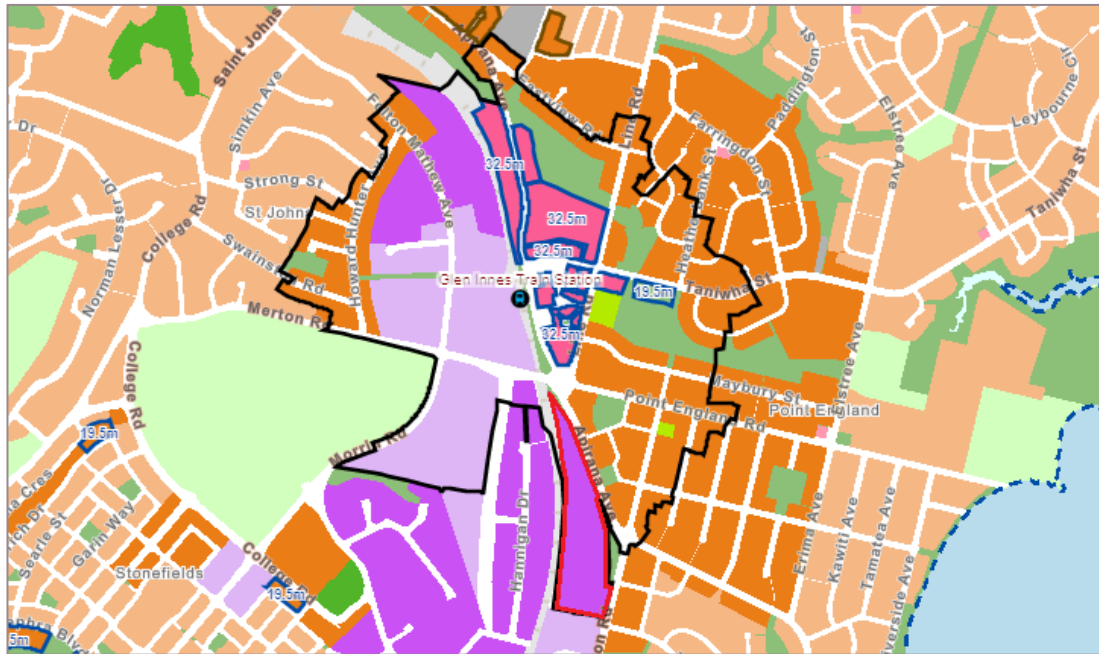
**Figure 2: AUP zoning with the Plan Change area outlined in blue (source: Auckland Council Geomaps).**

Existing residential land uses adjacent to the east includes a combination of three storey walk-up apartments and two storey terraces, including a number of apartments located at the corner of Pilkington Road and Torino Street at various stages of construction. These apartments form part of the Tamaki Regeneration Masterplan programme.

### 3.4 Proposed Plan Change 78

Auckland Council notified Proposed Plan Change 78 ('PC78') in August 2022 to give effect to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ('Amendment Act') and National Policy Statement on Urban Development ('NPS-UD'). The following provisions proposed under PC78 are of relevance to the Plan Change area:

- The Plan Change area and adjacent THAB zoned land is located within a walkable catchment from the Glenn Innes Train Station (**Figure 3**). Policy 3(c) of the NPS-UD requires the Council to enable building heights of at least six storeys within a walkable catchment of existing and planned rapid transit stops;
- Buildings heights of up to 21m within the walkable catchment of the Glen Innes Train Station;
- The height in relation to boundary recession plane is 19m and 60 degrees when the zoning of the adjacent site is THAB or Open Space – Informal Recreation zone; and
- No amendments are proposed to the 32.5m HVC over the Glen Innes Town Centre.



**Figure 3: Walkable catchment of the Glen Innes Train Station proposed under PC78 shown in black and the Plan Change area shown in red (source: Auckland Council Geomaps).**

Wyborn Capital made a submission to PC78 (submission no. 1110) seeking the following:

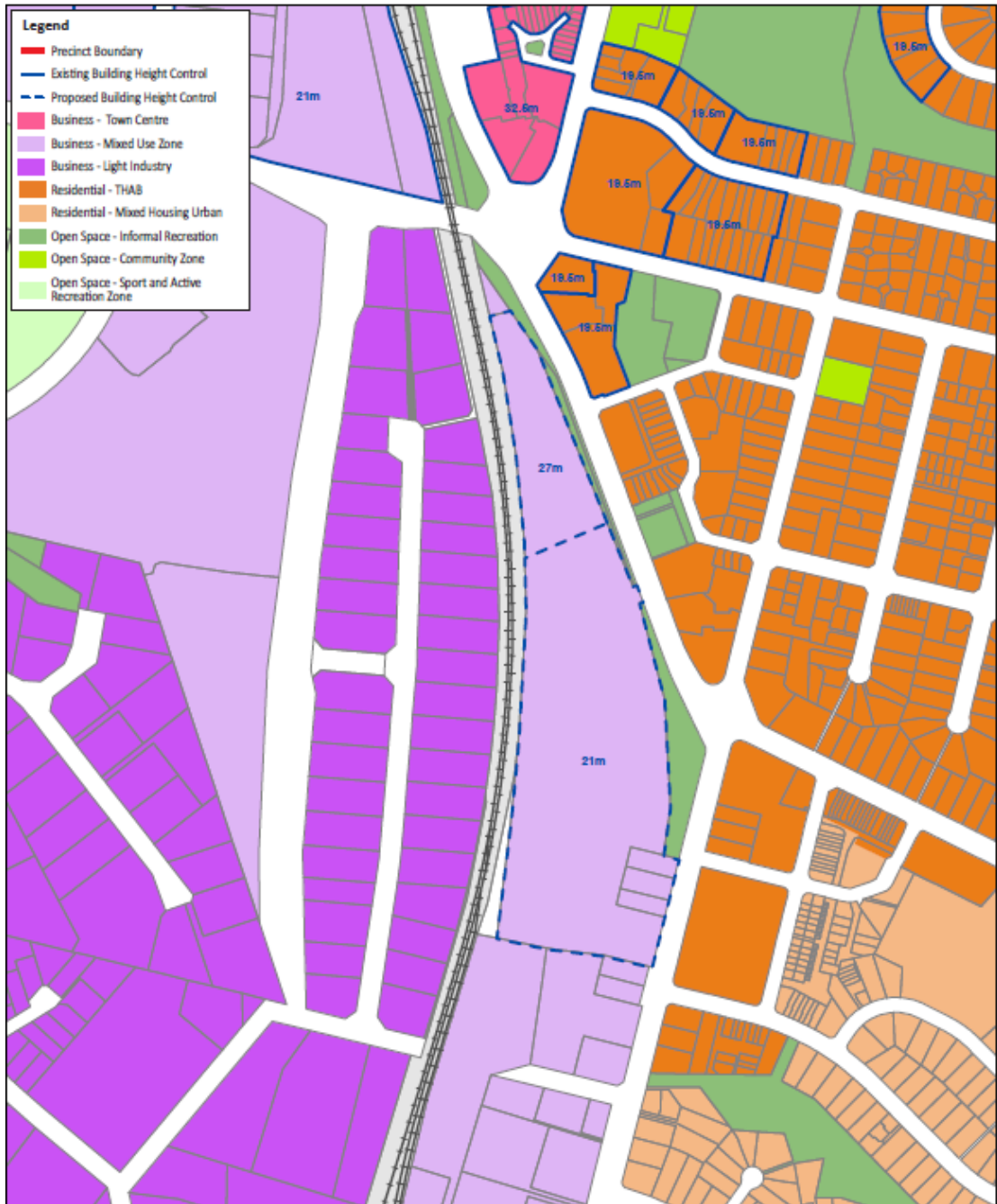
- That the walkable catchment applied to the Plan Change area is retained;
- That increased building heights within the Plan Change area be enabled up to the maunga viewshafts and height sensitive areas overlay; and
- Height limits of up to 40m on Business zoned land within a walkable catchment, to support feasible high-density development within Auckland, acknowledging the limited supply of Business zoned land in highly accessible locations.

At the time of writing, PC78 is progressing through the hearing process.

## 4.0 Description of the Plan Change Request

### 4.1 Description of the Proposal

The Plan Change proposal addressed by this report seeks to amend the AUP planning maps to rezone the Plan Change area from Light Industry zone to Mixed Use zone. The intent of the Plan Change is to primarily rely on the AUP provisions for the Mixed Use zone and Auckland-wide provisions to manage future development. Amendments to the planning maps are proposed to introduce a height variation control amendment to the planning to enable buildings heights of up to 27m and 21m within the Plan Change area, as shown in the maps included at **Appendix 2** and in **Figure 4** below.



**Figure 4: Proposed amendments to AUP(OP) planning maps.**

A precinct is also proposed to manage site-specific matters, and the proposed precinct provisions are focussed to matters in relation to achieving comprehensive redevelopment within the precinct, building height, height in relation to boundary, and reverse sensitivity noise effects to the adjacent railway corridor and arterial roads. In this regard, the precinct includes some variation to the standard zone and Auckland-wide provisions to introduce more tailored standards, matters of discretion and assessment criteria.

The precinct provisions are included at **Appendix 3**, and are summarised as follows:

- Achieving comprehensive redevelopment and high quality urban design outcomes within the Pilkington Park Precinct;

- An acoustic treatment and mechanical ventilation rule to ensure activities sensitive to noise adjacent to the railway corridor are designed to protect health and amenity and manage reverse sensitivity effects;
- A mechanical ventilation rule to ensure activities sensitive to noise adjacent to arterial roads are designed to protect health and manage reverse sensitivity effects;
- More permissive height in relation to boundary standard at the eastern frontage of Plan Change area, which adjoins parcels that are zoned Open Space – Informal Recreation Zone; and
- Associated objectives, policies, matters of discretion, and assessment criteria.

## 4.2 Purpose and Reasons for the Plan Change

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Clause 22(1) of the Resource Management Act 1991 ('RMA') requires that a Plan Change request explains the purpose of, and reasons for the proposed plan change.

The purpose of the Plan Change is to enable mixed use development and greater building height to make efficient use of land that is highly accessible to the Glen Innes Town Centre and Train Station. The reason for this Plan Change request is to enable the applicant, who is the landowner of the Plan Change area, to develop their landholdings in a manner consistent with the proposed zoning and planning framework.

The report provides an assessment of effects of the Plan Change and an evaluation of the Plan Change prepared in accordance with section 32 of the RMA. Supporting expert assessment reports are appended to the report. The evaluation of the Plan Change concludes that these amendments are the most appropriate way to achieve the purpose of the RMA.

## 5.0 Strategic Planning Framework

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A number of strategic and statutory planning documents have informed the Plan Change process. This section provides a summary of those documents relevant to the proposed Plan Change.

### 5.1 National Policy Documents

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#### 5.1.1 National Policy Statement on Urban Development

The National Policy Statement on Urban Development 2020 ('NPS-UD') came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPS-UD has assessed all the local authorities within the country and classified them as either Tier 1, Tier 2 or Tier 3, with Tier 1 referencing the largest local authorities in New Zealand (including Auckland Council). The NPS-UD provides direction to decision-makers under the RMA on planning for urban environments.

#### Well-Functioning Urban Environment

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

(a) *have or enable a variety of homes that:*

(i) *meet the needs, in terms of type, price, and location, of different households; and*

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

The components of a well-functioning urban environment that the Plan Change area will support include:

- Contributing to a variety of housing choices in Glen Innes and across the Plan Change area, including more intensive forms of housing like terraces and apartments in a highly accessible area close to the Town Centre and public transport;
- Enabling the Plan Change area to accommodate a range of different business sectors. In particular, the Economic Assessment included at **Appendix 4** finds that the Mixed Use zone will enable the flexible use of this land, which will benefit the localised catchment transitioning to a more mixed use environment;
- Promoting good accessibility between housing, jobs, community services and open spaces by enabling more people to live in accessible locations close to existing amenities and public and active transport, which also supports a reduction in greenhouse gas emissions through reduced car dependence;
- Supporting the competitive operation of land and development markets by providing an enabling zoning framework and providing flexibility for the market to take up those opportunities; and
- Being resilient through the likely current and future effects of climate change through promoting a compact and efficient urban form.

#### Planned Urban Built Form and Amenity Values

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

The Plan Change will enable development of greater height than what is currently provided for. The proposed Plan change, in combination with the proposed amendments under PC78 to give effect to the NPS-UD, will result in change over time to the existing built character of the surrounding area which predominantly includes buildings up to three storeys. The Plan Change and PC78 will enable a different set of amenity values to be realised over time, when compared to those currently associated with suburban environments. In particular, the amenity values offered within medium and higher density urban environments include more vibrant areas with additional

amenities which residents able to access amenities easily and largely via active modes of transport. Policy 6 essentially recognises and gives weight to these changing amenity values.

### Summary

Overall, it is considered that proposed Plan Change gives effect to the NPS-UD.

## 5.1.2 National Planning Standards

The National Planning Standards came into effect on 5 April 2019. These codify the structure, mapping, definitions and noise/vibration metrics of District, Regional and Unitary Plans. Auckland Council has 10 years to implement these changes. This Plan Change applies the standard AUP zone and rule framework to the Plan Change area, which is broadly consistent with the planning standards.

## 5.2 Strategic Plans

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### 5.2.1 The Auckland Plan 2050

The Auckland Plan is the key strategic document which sets the Council's social, economic, environmental and cultural objectives. A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan focusses new development in existing urban areas and provides for 'managed expansion' in future urban areas. This managed expansion is with reference to structure planning processes.

In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines this as:

- Most development occurs in areas that are easily accessible by public transport, walking and cycling;
- Most development is within reasonable walking distance of services and facilities including centres, community facilities, employment opportunities and open space;
- Future development maximises efficient use of land; and
- Delivery of necessary infrastructure is coordinated to support growth in the right place at the right time.

The Plan Change provides an opportunity to increase development capacity for residential and business activities, maximising the efficient use of highly accessible land to existing public transport, services and facilities including the Glen Innes Town Centre, Library, and Community Centre, and existing open spaces.

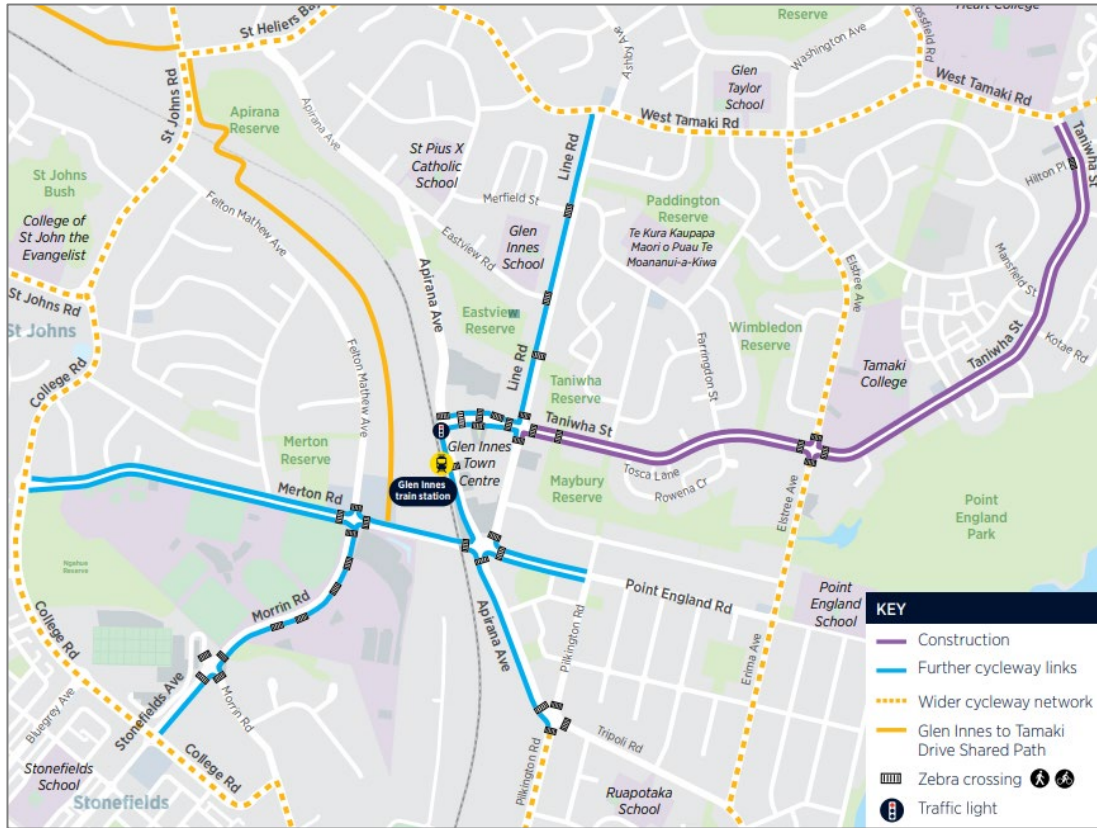
The Plan Change area will maximise land use efficiency through increased building heights up to 8- and 6-storeys, and a zoning framework which will provide for a range of residential and business activities. The land is located within urban Auckland and is serviced by existing infrastructure.

Overall, the Plan Change is consistent with the strategic direction of the Auckland Plan and will contribute to achieving a quality compact approach to urban growth.

### 5.2.2 Regional Land Transport Plan 2021-2031

The Regional Land Transport Plan ('RLTP') includes the 10-year investment programme for specific transportation projects in Auckland.

Of particular relevance to the Plan Change area and proposal is the Links to Glen Innes Cycleways programme, which will deliver dedicated cycleways and associated roading and transport upgrades in Glen Innes. The works are shown in **Figure 5** below, and include dedicated cycleways along the Apirana Avenue and Merton Road frontages as well as zebra crossings at the intersection of these roads, located to the north of the Plan Change area.



**Figure 5: Map of Glen Innes cycleways programme (source: Auckland Transport).**

5.3 This project is part of the Urban Cycleways Programme under the 2021-2031 RLTP, and is identified as committed and essential. At the time of writing, construction at Taniwha Street is in progress. Regional Policy Statement and Plans

5.3.1 Auckland Unitary Plan (Operative in Part)

The Regional Policy Statement (‘RPS’) sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. Of particular relevance to this Plan Change is Chapters B2 and B4 of the RPS which contains provisions directing urban growth and form in the Auckland Region. In particular, sections B2.2 and B2.3 set out the provisions relating to urban growth and form and a quality built environment and section B4.3 sets out the provisions relating to the management of public views to and between Auckland’s maunga. These objectives and policies are assessed in the sections below. Other relevant provisions of the RPS are included in the assessment at **Appendix 13**.

5.3.2 B2.2 Urban Growth and Form

*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.*
- (2) *Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).*
- (3) *Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.*
- (4) *Not applicable – the Plan Change does not include the urbanisation of land.*
- (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.*
- (2) *Not applicable – the Plan Change does not include the relocation of the Rural Urban Boundary.*
- (3) *Not applicable – the Plan Change does not include the rezoning of land within the Future Urban zone.*

#### *Quality compact urban form*

- (4) *Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns and rural and coastal towns and villages, and avoid urbanisation outside these areas.*
- (5) *Enable higher residential intensification:*
  - (a) *in and around centres;*
  - (b) *along identified corridors; and*
  - (c) *close to public transport, social facilities (including open space) and employment opportunities.*
- (6) *Identify a hierarchy of centres that supports a quality compact urban form:*
  - (a) *at a regional level through the city centre, metropolitan centres and town centres which function as commercial, cultural and social focal points for the region or sub-regions; and*
  - (b) *at a local level through local and neighbourhood centres that provide for a range of activities to support and serve as focal points for their local communities.*



- (7) *Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:*
- (a) *Support a quality 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) *Not applicable – a structure plan is not proposed.*
- (8) *Not applicable – the Plan Change does not include land in the Future Urban zone.*
- (9) *Not applicable – the Plan Change does not include land on Waiheke Island.*

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

- The Plan Change area is within an existing urban area and the proposed Mixed Use zone will contribute to a quality compact urban form that enables the efficient use of existing infrastructure and effective public transport through increased patronage;
- The proposed Plan Change will enable higher residential intensification around centres and close to public transport, social facilities and open space, and employment opportunities;
- The proposed Plan Change will accommodate urban growth in a highly accessible location that enables an increase to range of housing types and employment choices for the surrounding area; and
- As identified in the Economic Assessment included at **Appendix 4**, the application of the proposed Mixed Use zone will complement the Glen Innes Town Centre zone as it will enable a range of residential and commercial land use activities that do not cumulatively affect the function, role, and amenity of the Glen Innes Town Centre. The Plan Change proposal will not undermine the existing hierarchy of centres identified in the RPS.

### 5.3.3 B2.3 A Quality Built Environment

#### ***B2.3.1 Objectives***

- (1) *A quality built environment where subdivision, use and development do all of the following:*
- (a) *respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;*
  - (b) *reinforce the hierarchy of centres and corridors;*
  - (c) *contribute to a diverse mix of choice and opportunity for people and communities;*
  - (d) *maximise resource and infrastructure efficiency;*
  - (e) *are capable of adapting to changing needs; and*
  - (f) *respond and adapt to the effects of climate change.*
- (2) *Innovative design to address environmental effects is encouraged.*
- (3) *The health and safety of people and communities are promoted.*

#### ***B2.3.2 Policies***

- (1) *Manage the form and design of subdivision, use and development so that it does all of the following:*
  - (a) *supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;*
  - (b) *contributes to the safety of the site, street and neighbourhood;*
  - (c) *develops street networks and block patterns that provide good access and enable a range of travel options;*
  - (d) *achieves a high level of amenity and safety for pedestrians and cyclists;*
  - (e) *meets the functional, and operational needs of the intended use; and*
  - (f) *allows for change and enables innovative design and adaptive re-use.*
- (2) *Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:*
  - (a) *providing access for people of all ages and abilities;*
  - (b) *enabling walking, cycling and public transport and minimising vehicle movements; and*
  - (c) *minimising the adverse effects of discharges of contaminants from land use activities (including transport effects) and subdivision.*
- (3) *Enable a range of built forms to support choice and meet the needs of Auckland's diverse population.*
- (4) *Balance the main functions of streets as places for people and as routes for the movement of vehicles.*
- (5) *Mitigate the adverse environmental effects of subdivision, use and development through appropriate design including energy and water efficiency and waste minimisation.*

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

- The Plan Change area will enable future development that achieves the concepts of a quality built environment, including the opportunity to respond to the setting of the surrounding area;
- The Plan Change area and proposed Mixed Use zoning will enable more people to live and/or work in a location that is highly accessible to public transport, active modes infrastructure, and existing amenities;
- The enabled land use activities will contribute to a diverse mix of choice and opportunity for people and communities; and
- As previously discussed, the Plan Change area is located within an existing urban area serviced by infrastructure, and the proposal will enable the efficiency of existing infrastructure to be maximised.

#### 5.3.4 B4.3 Viewshafts

##### ***B4.3.1. Objectives***

- (1) *Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.*

- (2) Significant views from public places to the coastal environment, ridgelines and other landscapes are protected from inappropriate subdivision, use and development.

#### **B4.3.2. Policies**

- (1) Identify and evaluate a view to or between maunga for its regional or local significance considering the following factors:
- (a) the viewpoint conveys the view to an audience from a public viewpoint that is regionally or locally significant;
  - (b) the view conveys an intact view of the maunga within a wider context which is of high or good quality;
  - (c) the view will contribute to or reinforce an overall appreciation of the region's maunga;
  - (d) the view recognises the importance of the maunga to Mana Whenua;
  - (e) the extent to which there are other public views of and between the maunga; and
  - (f) taking into account the extent to which the viewshaft will affect future development otherwise enabled by this Plan.
- (2) Include a view in Schedule 9 Volcanic Viewshafts Schedule if it is regionally or locally significant.
- (3) Protect significant views to and between maunga by:
- (a) avoiding subdivision, use and development that would:
    - i) result in significant modification or destruction of view; or
    - ii) significantly detract from the values of the view; and
  - (b) avoiding where practicable, and otherwise remedying or mitigating, adverse effects of subdivision, use and development that would:
    - i) result in the modification of the view; or
    - ii) detract from the values of the view.
- (4) Protect the visual character, identity and form of maunga by:
- (a) identifying height sensitive areas around the base of maunga; and
  - (b) establishing height limits in such areas which control future development that could encroach into views and erode their significance.
- (5) Identify and evaluate a view from a public place to the coastal environment, ridgelines and other landscapes for its regional or local significance considering the following factors:
- (a) the viewpoint conveys the view to an audience from a public viewpoint that is regionally or locally significant;
  - (b) the view conveys an intact view within a wider context which is of high or good quality;
  - (c) the view will contribute to or reinforce an overall appreciation of the region's natural landscape;
  - (d) the view recognises the importance of the landscape to Mana Whenua; and
  - (e) the extent to which there are other similar public views; and
  - (f) taking into account the extent to which the viewshaft will affect future development otherwise enabled by this Plan.

*(6) Include a view in Schedule 11 Local Public View Schedule if it is locally significant.*

In this case, the proposed height strategy has been carefully considered alongside the maunga viewshaft contours that apply to the Plan Change area, and the future development of buildings up to the maximum allowable building height proposed will not protrude the existing viewshaft contours, allowing both locally and regionally significant views to Mount Wellington to be preserved. Existing provisions within Chapter D14 of the AUP will also apply to any future development, including a requirement for new buildings and structures to confirm compliance with the existing viewshaft contours. The proposed Plan Change is therefore considered to be consistent with the policy direction under B4.3 of the RPS.

## 5.4 Proposed Plan Changes

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Proposed plan changes 78-83 to the AUP were notified by Auckland Council on 18<sup>th</sup> August 2022. PC78 and PC80 are of particular relevance to the Plan Change proposal.

### 5.4.1 Plan Change 78: Intensification

PC78 is an Intensification Planning Instrument ('IPI') prepared under section 80F of the RMA, and seeks to give effect to the NPS-UD, and incorporate the MDRS into relevant residential zones. The proposed amendments under PC78 that are of relevance to the Plan Change area are identified in Section 3.4 above.

The proposed Plan Change is considered to be in keeping with proposed provisions under PC78 for the reasons discussed in Section 5.1.1 above. In particular, the proposal will contribute to housing variety and choice and the ability to accommodate a range of different business sectors in a highly accessible area identified as a walkable catchment under Policy 3(c)(i) of the NPS-UD.

### 5.4.2 Plan Change 80: RPS Well-Functioning Urban Environment, Resilience to the Effects of Climate Change and Qualifying Matters

PC80 includes amendments to the RPS to integrate concepts and terms under the NPS-UD, into the objectives and policies of the RPS. At the time of writing, PC80 is being progressed through the appeals process.

The proposed amendments to sections B2.2 Urban Growth and Form and B2.3 A Quality Built Environment seek to include the concepts of a well-functioning urban environment and urban resilience to the effects of climate change into the objectives and policies of the RPS.

As discussed in Section 5.1.1 above, it is considered that the proposed Plan Change is in keeping with the concepts of a well-functioning urban environment as identified in Policy 1 of the NPS-UD, and will contribute to urban resilience to the effects of climate change by supporting a reduction in greenhouse gas emissions through reduced car dependence.

It is therefore considered that the proposal will be in keeping with the amendments to the RPS proposed under PC80.

## 5.5 Other Plans

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### 5.5.1 Iwi Management Plans

There are 15 mana whenua groups within the Auckland Region who have a registered interest in the Plan Change area. Of these mana whenua Ngāti Whātua Ōrākei, Ngāi Tai ki Tāmaki, and Waikato – Tanui have publicly available Iwi Management Plans.

#### 5.5.1.1 Te Pou O Kāhu Pōkere – Iwi Management Plan for Ngāti Whātua Ōrākei 2018

The Ngāti Whātua Ōrākei Iwi Management Plan 2018 (Te Pou o Kahu Pokere) is the Iwi Management Plan for Ngāti Whātua Ōrākei for the purposes of the RMA. It is a statement of their interests and values as they apply in resource management matters. Te Pou o Kahu Pokere identifies desired outcomes at Section 4. Outcomes that are relevant to the Plan Change proposal included the integration of land use with mass transit and low carbon transport networks and the management of water to maintain or enhance mauri and to protect ecosystem, amenity, and mana whenua values.

The Plan Change proposal includes the rezoning of land located within close proximity to both existing and planning active and public modes of transport to enable a greater diversity of housing and business activities. This will encourage the use of alternative modes of transport and contribute to a reduction in greenhouse gas emissions. As discussed in Section 7.0 below, the effects of future redevelopment on infrastructure servicing and stormwater quantity and quality can be appropriately managed under the existing statutory framework.

#### 5.5.1.2 Take Taiaomaurkura

Take Taiaomaurikura is the iwi management plan for Ngāi Tai ki Tāmaki and sets out overarching principles. The management plan provides reference to the management of whenua at Section 8.6. Identified issues include the expansion of housing development and areas of industry leading to the loss of productive land, and ecosystems. More housing and infrastructure that is unsustainable will reduce the Mauri of the whenua and Ngāi Tai.

Identified objectives under Take Taiaomaurikura that are relevant to the Plan Change proposal include undertaking subdivision and land development in a manner that is sensitive to the whenua, and avoids all unreasonable risks to Te Taiao and protects culturally significant areas.

The Plan Change proposal includes the rezoning of existing urban land located within the Rural Urban Boundary. As discussed in Section 7.0 below, future development within the Plan Change area will be subject to the existing statutory framework to ensure potential effects on the environment are appropriately managed.

#### 5.5.1.3 Tai Tumu Tai Pari Tai Ao – Waikato-Tainui Environmental Plan

The Waikato-Tainui Environmental Plan seeks to provide a pathway that will result in the environmental restoration of the Waikato-Tainui rohe. This plan seeks to achieve a consistent approach to environmental management across the Wakato-Tainui rohe.

The Plan identifies key issues and objectives, policies, and methods for addressing these. The issues in relation to land use planning are relevant to the Plan Change proposal. In particular, the Plan identifies that land has historically been developed and/or subdivided in an ad hoc way, which can lead to adverse effects on the environment, customary activities, culturally and/or spiritually significant sites, or communities. For example, industrial or commercial development in areas that

are not well supported by the infrastructure required to effectively operate the activity, or that adversely impacts on residential living. Objective 25.3.2 seeks that urban and rural development is well planned and that the environmental, cultural, spiritual, and social outcomes are positive.

The Plan Change proposal includes the rezoning of existing urban land and located in an established urban area serviced by infrastructure. As discussed in 7.6 below, the Civil Engineering Report finds that future redevelopment can be adequately serviced by the existing networks stormwater, wastewater, and water supply without restrictions on capacity.

### 5.5.2 Tāmaki Regeneration Masterplan

The Tāmaki Regeneration Masterplan is a guiding document to urban regeneration within Tāmaki and across the suburbs of Glen Innes, Point England, and Panmure. The Tāmaki Regeneration Masterplan identifies 14 key moves that will collectively deliver regeneration outcomes, including creating social, economic, and housing opportunities, in particular for Māori and Pasifika Tāmaki whānau.

Assessment of the proposed Plan Change against the relevant key moves and, envisaged employment precinct, and regeneration priorities is included at **Appendix 14**. In particular, the proposed Plan Change will support key moves in relation to improved access and connectivity within Tāmaki, including by active and public modes, facilitating the potential for increased density and housing choice, and providing for the establishment of new commercial activities.

### 5.5.3 Maungakiekie-Tāmaki Local Board Plan 2020

The Maungakiekie-Tāmaki Local Board Plan 2020 sets out six key outcome areas and the objectives and key initiatives of focus for the Board. The Maungakiekie-Tāmaki Local Board Plan 2020 is aligned to the Auckland Plan.

The proposed Plan Change is considered to be in keeping with the following relevant outcome:

- Outcome Three: Our physical and social infrastructure is future-proofed: The Plan Change area is located within a location that is accessible to existing social infrastructure, including education and health facilities, community and civic spaces, and natural and open spaces. As demonstrated in the Civil Engineering Report included at **Appendix 8**, future development can be readily serviced by infrastructure.
- Outcome Four: Our transport choices are accessible, sustainable and safe: The Plan Change area is accessible to a range of existing and planned public and active mode choices, including the Glen Innes train station, bus services along Pilkington Road and from the Glen Innes Town Centre, the Tāmaki Loop, and Links to Glen Innes Cycleways.
- Outcome Six: Our people and businesses prosper economically and socially: The proposal will enable both residential and commercial activities to establish, providing opportunities for the community to live and work locally. The Plan Change area is also accessible to range of open space and recreational amenities.

## 6.0 Consultation

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### 6.1 Mana Whenua

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Mana whenua groups with a registered interest in the Plan Change area were notified of the proposal on 23 November 2022. A total of 15 mana whenua groups were contacted, and no requests for further engagement have been received at the time of lodgement.

A summary of consultation and copies of this correspondence is included at **Appendix 5**.

### 6.2 KiwiRail

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A meeting was held with KiwiRail on 21 April 2022 and a copy of the draft precinct provisions was circulated for comment. The inclusion of land within the railway corridor in the proposed Plan Change has also been discussed and agreed to with KiwiRail. A copy of the correspondence with KiwiRail is included at **Appendix 6**.

Consultation is ongoing at the time of lodgement.

### 6.3 Auckland Transport

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A meeting was held with Auckland Transport on 4 May 2023, where the following transportation matters were raised:

- Trip generation associated with adjacent residential developments, including the Hīnaki development at Tripoli Road and Te Tauoma Stage 1B development at Morrin Road.

The queries raised have are addressed in the Transport Assessment included at **Appendix 7**.

### 6.4 Watercare Services Limited

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A meeting was held with Watercare Services Limited ('WSL') on 12 May 2023, where the following servicing matters were raised:

- The management of the bulk wastewater main (Eastern Interceptor) located within the Plan Change area; and
- Expected water supply and wastewater demand and capacity.

The feedback received from WSL is included at **Appendix 6**, and responses to the queries raised have been included in the Civil Engineering Report included at **Appendix 8**.

### 6.5 Tāmaki Regeneration Company

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A meeting was held with Tāmaki Regeneration Company ('TRC') on 22 May 2023, where the following matters were discussed:

- Tamaki Regeneration housing and development programme;
- Relationship between the proposed Mixed Use zone and the Glen Innes Town Centre;

The queries raised in relation to the proposed Mixed Use zoning are addressed in the Economic Assessment at **Appendix 4** and Section 8.3 of this report.

## 7.0 Assessment of Environmental Effects

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

### 7.1 Urban Built Form

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An Urban Design Assessment of the proposed Plan Change has been undertaken by Barker & Associates, and is included at **Appendix 9**. The urban design assessment considers how the building scale and height sought through the Plan Change will facilitate a quality built environment.

The Urban Design Assessment finds that the proposed re-zoning of the site and increased building height will result in positive built form and streetscape outcomes. The proposal will create a single contiguous Mixed Use block with existing sites located directly south of the Plan Change Area, and will enable an integrated approach to future development and enhance the legibility of future built form. The Mixed Use zone provisions also include criteria for new buildings that ensure high quality design outcomes can be achieved, as all new buildings require resource consent for a restricted discretionary activity.

In relation to the proposed building heights, the Urban Design Assessment considers that the proposed height strategy will enhance the legibility of Pilkington Road and Apirana Avenue, including increasing the degree of street enclosure, which is recognised as being desirable within urban streets. The proposed height strategy has also been considered in relation to the Glen Innes Town Centre, where a HVC of 32.5m applies under the AUP. The proposed 27m within the northern part of the Plan Change area will enable a transition in building height from the Town Centre, reinforcing it as a focal point.

In relation to potential adverse effects of increased building height on the street and neighbouring sites, including shading, visual dominance, and privacy, the Urban Design Assessment concludes that the proposed Plan Change will have less than minor adverse effects. The closest residential sites are the THAB zoned sites located on the opposite side of Pilkington Road and Apirana Avenue, and modelling demonstrates that buildings heights up to 27m within the Plan Change area are able to comply with the recession plane required to apply under the operative provisions of the AUP. These properties will also be separated from the Plan Change area by the existing road reserve. Other adjacent zoning includes less sensitive Mixed Use zone adjacent to the south and Light Industry zone adjacent to the west and separated by the railway corridor.

With respect to achieving quality built environment outcomes, the Urban Design Assessment considers that the existing AUP framework for the assessment of new buildings in the Mixed Use zone is generally appropriate to achieve quality built environment outcome. Additional precinct provisions are also proposed to ensure that redevelopment occurs in a comprehensive manner that is well integrated with the existing features within the surrounding urban environment.

Overall, the Urban Design Assessment concludes that while the Plan Change proposal will enable a level of intensification that is appropriate from an urban design perspective, and the service and amenity available within Glen Innes Town centre and level of accessibility to a wide range of



destinations via public transport means that the area is well suited to accommodate a range of residential and commercial opportunities.

Based on the findings of the Urban Design Assessment, it is considered proposed plan change will facilitate redevelopment of the Plan Change area that will have positive effects in relation to urban built form, including improved amenity outcomes, enhanced legibility of Pilkington Road, Apirana Avenue, and visual reinforcement of the Glen Innes Town Centre within the wider environment.

## 7.2 Landscape and Visual Amenity

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The potential landscape and visual effects associated with the proposed Plan Change, including provision for building heights up to eight and six storeys, have been assessed in the Landscape Visual Assessment prepared by Barker & Associates included at **Appendix 10**.

The Landscape Visual Assessment concludes that the proposed Plan Change will result in a limited magnitude of change when viewed from a wider neighbourhood perspective and any future development can be accommodated within the Plan Change area and surrounding landscape with low visual effects. This due to the size of the Plan Change area site, proximity and connection to the Glen Innes Town Centre, and surrounding landscape elements including well-established vegetation within the Open Space – Informal Recreation zoned land.

In terms of site interfaces, the Landscape Visual Assessment finds that the Plan Change Area will be visible from three viewpoints, including from the railway corridor adjacent to the west, the residential dwellings adjacent to the east, and Glen Innes Town Centre to the north. Visual effects and landscape effects from a site interface perspective are assessed to be low and includes the following key conclusions in relation to these three viewpoints:

- The existing 2m high grassed bund, width and physical separation created by the adjoining railway corridor and existing street trees will help to visually screen, soften and contain future development within the Plan Change area when viewed from the west;
- Existing street trees and the width of the road corridor will contribute to screen, soften, and provide visual separation of future development within the Plan Change area when viewed from the Glen Innes Town Centre; and
- Existing street trees will contribute to softening views of the southern part of the Plan Change area when viewed from the adjacent THAB zoned located to the east and on the opposite side of Pilkington Road and Apirana Avenue.

Overall, the Landscape Visual Assessment concludes that the proposed Plan Change, which will enable mixed use and increased building heights, will generate low adverse visual effects and will result in positive effects, including contributing to a more vibrant and people focussed environment. Furthermore, it is identified that the provisions of the Mixed Use zone is likely to result in positive and legible built form outcomes. The Assessment also finds that the Plan Change area has a low level of visual amenity and makes a limited contribution to the adjoining streetscape and wider landscape.

Based on the findings of the Landscape Visual Assessment, it is considered that the proposed Plan Change will have less than minor adverse visual effects on the surrounding environment.

### 7.3 Industrial Land Supply

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The Plan Change proposal seeks to re-zone approximately seven hectares of land from Light Industry to Mixed Use. The relevant economic considerations, including the loss of industrial land capacity, are included in the Economic Assessment prepared by Property Economics, included at **Appendix 4**. The key conclusions of their assessment are summarised below:

- There is approximately 2,280 hectares of vacant and vacant potential (land with significant development potential) zoned light industrial land within the Auckland region. In addition, there is approximately 1,220 hectares of industrial land allocated within various Structure Plans for Future Urban zones. As a result, there is potential to support an additional 1,358 hectares of industrial land uses within the existing and future vacant industrial land supply, and up to an additional 3,668 hectares of industrial land use activity when including for vacant potential land;
- Given the estimated industrial land capacity and sufficiency within the Auckland region, the loss of approximately 7 hectares of light industry is considered minimal and would not undermine the growth of industrial activity within the local catchment or wider region;
- In the last 21 years, the localised catchment has experienced net growth in industrial employment at a slower rate than the Auckland region. It is expected that the trend of declining industrial employment will continue to occur;
- Property Economics attributes this slower growth rate to the surrounding industrial and suburban areas being well established, as it is expected that a greater proportion of industrial growth would have occurred in emerging industrial hubs and growth areas where vacant land is more freely available and there are competitive advantages such as lower land values; and
- The Mixed Use zone will enable a variation of activities and provide for an efficient means to redevelop the site. A number of light industry activities within the Plan Change area, including manufacturing and servicing, warehousing and storage, and a childcare centre are permitted within the Mixed Use zone and these activities will not be displaced following the change in zoning.

Having regard to the assessment and findings contained within the Economic Assessment, it is considered that the potential effects of the Plan Change on industrial land supply within the Auckland Region will be acceptable.

### 7.4 Transport

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Redevelopment of the site is not proposed as part of the Plan Change, and no changes are proposed to the AUP transport provisions. Nonetheless the Plan Change will provide additional development capacity to what is currently enabled under the AUP Light Industry zone and a Transport Assessment has been prepared by Parlane & Associates, included at **Appendix 7**. The key conclusions of their assessment are summarised below:

- The Plan Change area is well serviced in terms of public transport, being within walking distance of the Glen Innes Train Station and a range of bus services, including the Tāmaki Link, 74 Onehunga to Glen Innes, 75 Glen Innes to Wynyard Quarter, and 76 Glen Innes to City Centre. The 744 Panmure to St Heliers service also passes the Plan Change area along Pilkington Road;

- As discussed in Section 5.2.2, Links to Glen Innes Cycleways is a committed and essential programme in the RLTP, and a part of the Urban Cycleways Programme which seeks to deliver key sections of the Auckland cycle network. The Glen Innes Cycleways programme includes cycling facilities along Apirana Avenue and new zebra crossings at the Apirana Avenue and Merton Road roundabout located to the north of the Plan Change area. The programme of works will enhance accessibility to active modes of transport, including to the Glen Innes Town Centre and Train Station;
- The Plan Change will enable land use activities which have the potential to generate additional transport related effects. The Transport Assessment finds that traffic generated will retain an acceptable network level of service, including at the Pilkington Road and Tripoli Road roundabout and the Apirana Avenue and Merton Road roundabout; and
- There are a number of provisions in the AUP to manage the transport related effects of future redevelopment, as would be provided for by the proposed Mixed Use zone and maximum building height. This includes vehicle access restrictions to an arterial road, requirements for trip generation assessments, the design of any parking and loading, and provision of bicycle storage and end of trip facilities to encourage alternative modes of transport.

Overall, it is considered that the Plan Change area is well placed from a transport perspective to accommodate the level of development enabled by the Plan Change, including by encouraging mode shift as a result of high levels of accessibility to public and active modes of transport. Furthermore, it is considered that transport effects can be appropriately managed under existing AUP provisions.

## 7.5 Noise

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An assessment of the potential noise effects associated with the Plan Change proposal has been prepared by Styles Group, included at **Appendix 11**. Their report sets out the considerations for noise and vibration, including in relation to:

- The management of noise effects as part of future redevelopment;
- The potential noise effects from the proposed Mixed Use zoning of the Plan Change area; and
- The potential noise effects from the railway corridor and Pilkington Road and Apirana Avenue, which are classified as arterial roads.

The key conclusions and recommendations of their assessment are summarised below:

- The underlying AUP standards for noise will require acoustic treatment for all activities sensitive to noise within the Mixed Use zone, and these measures will be sufficient to manage the potential noise emissions from other activities which may establish within adjacent Light Industry and Mixed Use zoned land;
- The Plan Change proposal will not unduly constrain the continued operation of adjacent Light Industry zoned sites located at Hannigan Drive. This is because the railway corridor will provide a separation distance of approximately 25m, and there is an existing requirement under the AUP for these Light Industry zones to meet lower night time noise limits at existing adjacent sites located within the Mixed Use and THAB zones;
- Due to separation distance and the logical future orientation of future building resulting from the shape of the Plan Change area, it is anticipated that vibration levels will be acceptable;

- Additional requirements for acoustic treatment and/or mechanical ventilation are recommended for all activities sensitive to noise located within 60m of the railway corridor and arterial roads. This is because the AUP does not include equivalent rules or standards for sensitive activities located within close proximity to the railway corridor. Styles Group consider that the underlying AUP standards for other sensitive activities will be adequate to protect activities outside of these areas; and
- Additional requirements are also recommended to require that the noise level within outdoor play areas for care centres within 60m of the railway corridor do not exceed 55dB LAeq. This may be achieved through acoustic treatment or the design and orientation of play areas.

Overall, the assessment by Styles Group finds that noise and vibration effects within the Plan Change can be appropriately managed under the provisions of the AUP and additional considerations to address the adjacent railway corridor to the west. The recommendations of Styles Group are therefore proposed to apply in the precinct provisions included at **Appendix 3**.

Overall, it is considered that potential noise and vibration effects from the associated with the proposed Plan Change can be appropriately managed.

## 7.6 Infrastructure Servicing

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A Civil Engineering Report has been prepared by Blue Barn Consulting ('Blue Barn'), included at **Appendix 8**. Their report sets out the considerations for infrastructure servicing within the Plan Change area. The key conclusions of their assessment are summarised below:

- **Stormwater:** The Plan Change area is serviced by the existing public stormwater network, available at the eastern and western boundaries. As the existing Plan Change area has already been developed to maximum impervious areas, it is anticipated that only minor upgrades to the existing stormwater network will be required to service any future development.
- **Wastewater:** An existing wastewater connection is available at Apirana Avenue and analysis undertaken by Blue Barn indicates that a mixed-use development is likely to result in a reduction to peak wastewater flows when compared to the existing development within the Plan Change area. An existing 2.1m diameter public concrete wastewater transmission line is located through the site between the north eastern boundary and south western corner. It is anticipated that Watercare guidelines for building over or near existing services will be incorporated during future development, which will be designed accordingly.
- **Water Supply:** Hydrant test flows show that there is sufficient capacity within the existing water mains located on Apirana Avenue to service future re-development of the Plan Change area. Additional connections to the water main located in Pilkington Road are also available.
- **Utilities:** It is anticipated that all future development can be serviced by power and telecommunication connections.

Overall, Blue Barn's assessment finds that future redevelopment can be adequately serviced by the existing networks stormwater, wastewater, and water supply without restrictions on capacity.

It is also noted that the Plan Change area includes existing light industrial buildings and activities that are readily serviced by the existing reticulated network. It is therefore considered that servicing effects associated with the proposed Plan Change can be appropriately managed under

existing AUP provisions and regulatory frameworks, where the detailed infrastructure design will be determined as part of any future redevelopment.

## 7.7 Flooding and Stormwater Management

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As noted above, the existing Plan Change area comprises fully developed impervious areas. Notwithstanding, considerations for flooding and stormwater management are included in the Civil Engineering Report prepared by Blue Barn, and included at **Appendix 8**.

The Plan Change area is not subject to any flood plains, flood prone areas, or flood sensitive areas. There are a number of overland flow paths which drain towards Apirana Avenue. These overland flow paths will be managed as part of any future development in accordance with relevant AUP provisions.

The Plan Change area is categorised as a brownfield site and the requirements of the Network Discharge Consent ('NDC') will apply to future redevelopment, including for stormwater treatment, retention, and detention. In addition, the northern part of the Plan Change area is located within a Stormwater Management Area Flow 1 under the AUP. Blue Barn's assessment finds that the required volumes for retention and detention can feasibly be obtained through the use of on-site devices.

Compliance with the requirements of the AUP and NDC will ensure that future development does not adversely affect downstream properties or the Omaru Creek, which stormwater discharges to from the public network. It is therefore considered that potential effects of the Plan Change associated with flooding and stormwater management can be appropriately managed under existing AUP provisions and regulatory frameworks.

## 7.8 Contamination

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A Contamination Assessment of the Plan Change area has been undertaken by Engeo and is included at **Appendix 12**. Their assessment finds that the site is likely to have been subject to a number of HAIL activities, and further Preliminary and Detailed Site Investigations under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ('NESCS') and AUP will be required at the time future development.

Resource consent requirements under the NESCS and AUP would ensure that a Site Management Plan is prepared at the time of resource consent for subdivision or development to demonstrate how the works will be managed to ensure that any land disturbance and urban use of the land avoid and mitigate adverse effects on the environment and human health.

Engeo concludes that the conversion of land with the identified HAIL activities is not uncommon and the presence of those activities does not make the land unsuitable for a future change of use in activity.

It is therefore considered that there is a high level of confidence that the Plan Change area can accommodate a change in land use activity and that the potential adverse effects of land contamination can be appropriately managed through the existing statutory framework with respect to the NES regulations and AUP for any discharges.

## 7.9 Open Space and Social Facilities

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The Plan Change area is highly accessible to open space and other social facilities. In particular, the Glen Innes Town Centre and train station are within a 10 minute walking catchment for the majority of the Plan Change area, with the remaining southern part being within a 15 minute walking catchment. Existing facilities available within the Town Centre include supermarkets, the Glen Innes Library, Glen Innes Community Hall, and the Te Oro Arts Centre.

The existing open spaces that are accessible from the Plan Change area are shown at **Appendix 15**. With respect to the closest open spaces, an unnamed area of open space is located on the opposite side of Apirana Avenue, and within a 400m walking catchment of the Plan Change area. The northern part of the Plan Change area is within a 400m walking catchment of Talbot Reserve. The Plan Change area is also within a 1,000m walking catchment of Colin Maiden Park located to the north west, which includes extensive fields for recreational and organised sports. These walking distances are generally in accordance with the Auckland Council Open Space Provision Policy 2016 for neighbourhood and suburb parks.

In summary, the surrounding open space, amenities, and social facilities are accessibly by active modes of transport, and are of a sufficient size to cater for the social and cultural needs and well-being of future residents of the Plan Change area.

### 7.10 Summary of Effects

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The actual and potential effects of the proposed Plan Change have been considered above, based on reporting and analysis undertaken by a range of technical experts. On the basis of this analysis, it is considered that the area is suitable for redevelopment to accommodate a mix of residential and commercial land uses. The Plan Change will facilitate redevelopment that will result in positive effects on the environment in terms of the social and economic well-being of the community, and the development can be serviced by existing infrastructure. Where adverse effects are anticipated, the proposed policies and rules of the Plan Change, in addition to those in the AUP, will ensure they are appropriately avoided, remedied, or mitigated.

## 8.0 Section 32 Analysis

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### 8.1 Appropriateness of the Proposal to Achieve the Purpose of the Act

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

#### 8.1.1 Objectives of the Plan Change

The purpose or overarching objective of the Plan Change is to deliver a high-quality and high-density mixed-use development through the rezoning of land located within close proximity to the Glen Innes Town Centre and existing public transport. The Plan Change will enable the efficient use of this land and achieve medium and high density activities in accordance with the provisions of the Mixed Use zone chapter under the AUP, while managing noise effects to provide for people's health and amenity.

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

- The development of a high-quality, mixed-use centre that is well-designed and integrated with the surrounding area;
- The efficient use of land to deliver residential and commercial activities in proximity to existing centres, and public and active modes of transport;
- The protection of people’s health and amenity where activities sensitive to noise are located adjacent to the railway corridor; and
- Activities sensitive to noise located adjacent to the railway corridor does not unduly constrain the operation of the North Island Main Trunk Line.

### 8.1.2 Assessment of the Objectives Against Part 2

In accordance with Section 32(1)(a), the table below provides an evaluation of the objectives of the plan change.

Objective	RMA s5 Purpose	RMA s6 Matters of National Importance	RMA s7 Other Matters	RMA s8 Treaty of Waitangi
<p>The Pilkington Park Precinct is comprehensively developed as a high-quality, mixed-use centre which is well-designed and integrated with the surrounding area.</p>	<p>Through seeking high-quality development that is comprehensively well-design and integrated with the surrounding area, this objective will ensure the quality of built environment meets the reasonably foreseeable needs of future generations in accordance with s5(2)(a).</p>	<p>This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.</p>	<p>Through seeking high-quality development that is well-design and integrated with the surrounding area, this objective has regard to the maintenance and enhancement of amenity values in accordance with s7(c).</p>	<p>This objective will not offend against the principles of the Treaty of Waitangi.</p>
<p>New buildings respond to and positively contribute to the amenity values of the public space network including open spaces and streets.</p>	<p>Through seeking buildings that respond positively to the surrounding environment, this objective will ensure the quality of the built environment meets the reasonably foreseeable needs of future generations in accordance with s5(2)(a).</p>	<p>This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.</p>	<p>Through seeking buildings that respond positively to the surrounding environment, this objective has regard to the maintenance and enhancement of amenity values in accordance with s7(c).</p>	<p>This objective will not offend against the principles of the Treaty of Waitangi.</p>
<p>Development provides for an efficient use of land to deliver residential and commercial activities in proximity to existing centres, and public and active modes of transport.</p>	<p>Through providing for an efficient use of land for residential and commercial activities, this objective enables future generations to meet their social, economic, and cultural well-being by:</p>	<p>This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of objectives which will</p>	<p>Development that provides the efficient use of land in proximity to exiting centres and public and active modes of transport will contribute to the efficient use and development of natural and physical</p>	<p>This objective will not offend against the principles of the Treaty of Waitangi.</p>



Objective	RMA s5 Purpose	RMA s6 Matters of National Importance	RMA s7 Other Matters	RMA s8 Treaty of Waitangi
	<ul style="list-style-type: none"> <li>• Providing opportunities for a variety of housing types to meet the diverse needs of the community; and</li> <li>• Providing opportunities for local employment without compromising the higher order centres and the role these have within the wider community.</li> </ul>	appropriately manage matters of national importance within the Plan Change area.	resources in accordance with s7(b).	
<p>Activities sensitive to noise located adjacent to the rail corridor are designed to protect people’s health and amenity values, and in a way which does not unduly constrain the operation of the North Island Main Trunk Line.</p>	<p>Through managing activities sensitive to noise to protect people’s health and amenity, will ensure the built environment the reasonably foreseeable needs of future generations in accordance with s5(2)(a).</p> <p>Through not unduly constraining the operation of the railway corridor, this objective will providing for the ongoing operation of physical infrastructure resources to meet the</p>	<p>This objective does not compromise the recognition of, or the provision of the relevant matters of national importance. The AUP contains a suite of objectives which will appropriately manage matters of national importance within the Plan Change area.</p>	<p>Through managing activities sensitive to noise to protect people’s health and amenity, this objective has regard to the maintenance and enhancement of amenity values in accordance with s7(c).</p>	<p>This objective will not offend against the principles of the Treaty of Waitangi.</p>

Objective	RMA s5 Purpose	RMA s6 Matters of National Importance	RMA s7 Other Matters	RMA s8 Treaty of Waitangi
	reasonably foreseeable needs of future generations in accordance with s5(2)(a).			

## 8.2 Appropriateness of the Provisions to Achieve the Objectives

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### 8.2.1 The Objectives

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

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

As the proposed Plan Change is amending the AUP, the above assessment must relate to the provisions and objectives of the proposed Plan Change, and the objectives of the AUP to the extent that they are relevant to the proposed Plan Change and would remain if the Plan Change were to take effect<sup>1</sup>.

In addition to the objectives of the proposed Plan Change which are outlined above, the AUP objectives with particular relevance to this plan change are summarised below:

Within the RPS:

- B2.2.1(1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and urban growth; (c) better use of existing infrastructure and efficient provision of infrastructure; (d) improved and more effective public transport; (e) greater social and cultural vitality; and (g) reduced adverse environmental effects.
- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.3.1(3) The health and safety of people and communities are promoted.
- B4.3.1(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.

Within the Business Zones:

- H13.2(6) Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the public transport network.
- H13.2(2) Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.

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

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<sup>1</sup> RMA s32(3)

## 8.3 Other Reasonably Practicable Options for Achieving the Objectives

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### 8.3.1 Theme 1: Zoning

The existing AUP and proposed precinct objectives which have particular relevance to Theme 1 include:

- B2.2.1(1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and urban growth; (c) better use of existing infrastructure and efficient provision of infrastructure; (d) improved and more effective public transport; (e) greater social and cultural vitality; and (g) reduced adverse environmental effects.
- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- H13.2(6) Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the public transport network.
- IX.2(1) The Pilkington Park Precinct is comprehensively developed as a high-quality, mixed-use centre which is well-designed and integrated with the surrounding area.
- IX.2(3) Development provides for an efficient use of land to deliver residential and commercial activities in proximity to existing centres, and public and active modes of transport.

In determining the most appropriate method for achieving the objectives of the Plan Change, the following other reasonably practicable options have been considered:

- Option 1 – Status quo: retain the Business – Light Industry zone.
- Option 2 – Apply Business – Mixed Use zone to the Plan Change area.
- Option 3 – Apply Residential – Terrace Housing and Apartment zone to the Plan Change area.

**Table 1** below evaluates these options against the requirements of section 32(1)(b).

It is considered that the most appropriate option is Option 2, and the proposed Plan Change applies the Business – Mixed Use zone to the Plan Change area.

**Table 1: Theme 1: Zoning – Evaluation of Options.**

	Option 1 – Status quo: Apply Business – Light Industry zone	Option 2 – Proposed Plan Change: Apply Business – Mixed Use zone	Option 3 – Apply Residential – Terrace Housing and Apartment Building zone
<b>Description of option</b>	This option retains the Business – Light Industry zone across the Plan Change area.	This option applies the Business – Mixed Use zone across the Plan Change area	This option applies the Residential – Terrace Housing and Apartment Building zone across the Plan Change area
<b>Efficiency and effectiveness in achieving objectives</b>	This option is less efficient and effective at achieving B2.2.1(1) and B2.3.1(1) as Options 2 and 3. Option 1 will provide ongoing productivity and urban growth for employment opportunities, however it does not enable the use of highly accessible land to accommodate residential development, and is less capable of adapting to changing needs, particularly for employment where there are declining trends for industrial employment in the local catchment.	This option is efficient and effective at achieving B2.2.1(1), B2.3.1(1), and H13.2(6) as it will enable a quality compact urban form and quality built environment through redevelopment of the Plan Change for a diverse mix of land use activities within a highly accessible location.	This option is efficient and effective at achieving B2.2.1(1), B2.3.1(1), and H13.2(6) though not to the extent of Option 2. While Option 3 will enable a quality compact urban form and quality built environment through the redevelopment of the Plan Change area for higher amenity residential land use activities, it will not facilitate a range of activities which can support the social wellbeing of surrounding residents.
<b>Benefits</b>			
<i>Environmental</i>	This option will retain the character of the existing commercial and light industry activities within the Plan Change area.	This option will increase the amenity of the Plan Change area as it is redeveloped in accordance with the Mixed Use zone, which seeks a higher level of amenity and design quality in comparison to the Light Industry zone.	This option will increase the amenity of the Plan Change area as it is developed for residential housing.
<i>Economic</i>	This option will enable the ongoing operation of existing commercial and	This option will enable the greatest flexibility of land use activities,	This option will provide for the efficient use of land, though not to

	Option 1 – Status quo: Apply Business – Light Industry zone	Option 2 – Proposed Plan Change: Apply Business – Mixed Use zone	Option 3 – Apply Residential – Terrace Housing and Apartment Building zone
	light industry activities within the Plan Change area. However, the level of economic activity enabled is less than that that under Options 2 and 3.	including residential, retail, and commercial. As detailed in the Economic Assessment ( <b>Appendix 4</b> ), this will provide for the greatest land use efficiency, ability to adapt to the changing employment composition/trends of the local market, and the potential to generate the highest level of local investment. The Economic Assessment also finds that the total population within the localised catchment to the Plan Change area is estimated to experience a net growth of 32 per cent above the current population base by 2048, which will need to be accommodated by additional residential, retail, and employment activities within the localised market to improve efficiencies.	the extent of Option 2 as it will not provide for a range of land use activities.
<i>Social</i>	This option will provide for the ongoing operation of existing activities within the Plan Change area, and no change to the regulatory planning framework, which will continue to provide for existing employment opportunities and services.	This option will provide a range of opportunities for residential housing, employment, and supporting amenities, enabling more people to live within Glen Innes and within a location that is accessible highly to public transport, open space, and the Glen Innes Town Centre. This option will also provide opportunities for additional amenities that will support existing and future residents within	This option will provide opportunities for residential housing, enabling more people to live within Glen Innes and in an area that is highly accessible to public transport, open space, and existing amenities in the Glen Innes Town Centre.

	Option 1 – Status quo: Apply Business – Light Industry zone	Option 2 – Proposed Plan Change: Apply Business – Mixed Use zone	Option 3 – Apply Residential – Terrace Housing and Apartment Building zone
		the surrounding area as intensification occurs in accordance with the directions of the NPS-UD.	
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option as the Plan Change area has not been identified as a site of significance to Mana Whenua through the AUP or engagement with the relevant authorities.	There is no change to the cultural environment through this option as the Plan Change area has not been identified as a site of significance to Mana Whenua through the AUP or engagement with the relevant authorities.
<b>Costs</b>			
<i>Environmental</i>	This option will not facilitate the redevelopment of the Plan Change area for residential and business land use activities, and there will be no change or improvement to the visual appearance or amenity values associated with the Plan Change area.	This option will enable the redevelopment of the site for residential and business activities, which has the potential to create reverse sensitivity effects with adjoining light industry activities. However, the closest light industry zoned land is located to the west and is separated from the Plan Change area by existing ground levels and the existing railway corridor.	This option will enable the redevelopment of the site for residential activities, which has the potential to create reverse sensitivity effects with adjoining light industry activities. However, the closest light industry zoned land is located to the west and is separated from the Plan Change area by existing ground levels and the existing railway corridor.
<i>Economic</i>	This option does not enable the efficient use of land located within a ten minute walking catchment to the Glen Innes Tran Station and Town Centre, and there are opportunity costs for the land use activities that can occur. As assessed in the Economic Assessment ( <b>Appendix 4</b> ), the localised	This option results in the loss of approximately seven hectares of industrial land capacity. However, as assessed in the Economic Assessment, the loss of industrial land is considered to be minimal and unlikely to	This option does not enable the most efficient use of land for employment opportunities to the same extent as Option 2, as the THAB zone will not provide for a broad range of commercial activity.

	Option 1 – Status quo: Apply Business – Light Industry zone	Option 2 – Proposed Plan Change: Apply Business – Mixed Use zone	Option 3 – Apply Residential – Terrace Housing and Apartment Building zone
	market has seen a decline in industrial employment as a share of total employment over the last two decades.	undermine the growth of industrial activity within the Auckland Region.	
<i>Social</i>	This option will not enable redevelopment opportunities to provide housing and/or supporting amenities in an area that is highly accessible to public transport and existing amenities.	The potential for redevelopment and new land use activities enabled through this option may be considered by some members of the community to not be in keeping with expectations given the existing Light Industry zoning of the site.	This option has the potential to create tensions between new residential development and existing activities in the Plan Change area as the residential zone may affect the expectations of future residents and the community in terms of the level of amenity that is achieved.  This option will also limit the range of future land use activities, including the ability to develop supporting non-residential activities to support the needs of existing and future residents in the surrounding area.
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option as the Plan Change area has not been identified as a site of significance to Mana Whenua through the AUP or engagement with the relevant authorities.	There is no change to the cultural environment through this option as the Plan Change area has not been identified as a site of significance to Mana Whenua through the AUP or engagement with the relevant authorities.
<b>Summary</b>	Option 2 is the preferred option. Applying the Mixed Use zone to the Plan Change area is the most appropriate mechanism to achieve the objectives because:		



	Option 1 – Status quo: Apply Business – Light Industry zone	Option 2 – Proposed Plan Change: Apply Business – Mixed Use zone	Option 3 – Apply Residential – Terrace Housing and Apartment Building zone
	<ul style="list-style-type: none"> <li>• In accordance with B2.2.1(1) and B2.3.1(1), it will provide redevelopment opportunities that will contribute to a quality compact urban form and quality built environment while also facilitating a diverse mix of choice and opportunity for people and communities; and</li> <li>• In accordance with H13.2(6), it will facilitate moderate residential activities and employment opportunities on land that is in close proximity to the Town Centre zone and public transport network.</li> <li>• In accordance with IX.2(3), it will facilitate the efficient use of highly accessible land for future residential and commercial activities.</li> </ul>		

### 8.3.2 Theme 2: Maximum Allowable Building Height

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

- B2.2.1(1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and urban growth; (c) better use of existing infrastructure and efficient provision of infrastructure; (d) improved and more effective public transport; (e) greater social and cultural vitality; and (g) reduced adverse environmental effects.
- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B4.3.1(1) Significant public views to and between Auckland's maunga are protected from inappropriate subdivision, use and development.
- H13.2(2) Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.
- IX.2(3) Development provides for an efficient use of land to deliver residential and commercial activities in proximity to existing centres, and public and active modes of transport.

In determining the most appropriate method for achieving the objectives of the Plan Change, the following other reasonably practicable options have been considered:

- Option 1 – Status quo: apply the Business – Mixed Use zone Building Height standard, being up to 18m total building height to the Plan Change area.
- Option 2 – Apply the Business – Mixed Use zone Building Height standard proposed under PC78, being up to 21m total building height to the Plan Change area.
- Option 3 – Apply total building heights of 21m and 27m to the Plan Change area.
- Option 4 – Apply a total building height of 32.5m to the Plan Change area.

**Table 2** below evaluates these options against the requirements of section 32(1)(b).

It is considered that the most appropriate option is Option 3, and the Plan Changes proposes and height variation controls for up to 27m (8 storeys) and 21m (6 storeys) across the Plan Change area.

**Table 2: Theme 2: Maximum Allowable Building Height – Evaluation of Options.**

	Option 1 – Status quo: Business – Mixed Use zone Building Height standard	Option 2 – Business – Mixed Use zone Building Height standard proposed under PC78 (21m total building height)	Option 3 – Proposed Plan Change: total building heights of 27m and 21m.	Option 4 – Total building height of 32.5m
<b>Description of option</b>	This option applies the total building height permitted in the operative Mixed Use zone, being 18m.	This option applies the total building height proposed under PC78, being 21m as the Plan Change area is located within a walkable catchment.	This option applies total building heights of 27m to the north of the Plan Change area and 21m to the south of the Plan Change area.	This option applies a total building height of 32.5m across the Plan Change area.
<b>Efficiency and effectiveness in achieving objectives</b>	This option is not efficient or effective at achieving B2.2.1(1)(b) and B2.3.1(d) as it does not enable greater productivity and urban growth, or resource and infrastructure efficiency. This is because a building height of 18m will be less than the NPS-UD requirement to enable building heights of at least six storeys within a walkable catchment.	This option is efficient and effective at achieving B2.2.1(1)(b) and B2.3.1(d) as it will enable increased capacity for redevelopment on highly accessible land, though not to the extent of Options 3 and 4.	This option efficient and effective at achieving B2.2.1(1)(b) and B2.3.1(d) as it will enable increased capacity for redevelopment on highly accessible land, though not to the extent of Option 4.  This option is also efficient and effect at achieving H13.2(2), as it will enable a transition in building height between the Glen Innes Town Centre (32.5m), the northern part of the Plan Change area (27m), and the southern part of the Plan Change area (21m). This transition will reinforce the hierarchy of centres and corridors and the Town	This option efficient and effective at achieving B2.2.1(1)(b) and B2.3.1(d) as Options 3 and 4 as it will enable increased capacity for redevelopment on highly accessible land.  This option is not efficient or effective at achieving H13.2(2) as a building height of 32.5m will be consistent with the maximum allowable height in the Glen Innes Town Centre, compromising the extent to which the Town Centre is reinforced as a focal point for the community.

	Option 1 – Status quo: Business – Mixed Use zone Building Height standard	Option 2 – Business – Mixed Use zone Building Height standard proposed under PC78 (21m total building height)	Option 3 – Proposed Plan Change: total building heights of 27m and 21m.	Option 4 – Total building height of 32.5m
			Centre as a focal point for the community.	
<b>Benefits</b>				
<i>Environmental</i>	This option will enable lesser building height than the operative Light Industry zoning and does not create the potential for adverse building bulk and intensity effects on adjacent sites.	This option will enable the efficient use of highly accessible land and provide for building heights that are less than the Glen Innes Town Centre, ensuring that new buildings do not detract from the Town Centre as a focal point within the community.	This option will enable the efficient use of highly accessible land and a cohesive transition in building height between the Glen Innes Town Centre, reinforcing the Town Centre as a focal point within the community.	This option will enable greater buildings heights that do not exceed those within the Glen Innes Town Centre.
<i>Economic</i>	This option does not facilitate any improved economic outcomes.	This option will enable increased capacity for redevelopment on highly accessible land, though not to the same extent as Option 3 or 4. Increased development potential will contribute to the vitality of the of Glen Innes Town Centre, public transport use, and infrastructure efficiencies.	This option will enable increased capacity for redevelopment on highly accessible land, though not to the same extent as Option 4. Increased development potential will contribute to the vitality of the of Glen Innes Town Centre, public transport use, and infrastructure efficiencies.	This option will enable increased capacity for redevelopment on highly accessible land to the greatest extent. Increased development potential will contribute to the vitality of the of Glen Innes Town Centre, public transport use, and infrastructure efficiencies.
<i>Social</i>	This option will enable lesser building height than the operative Light Industry	This option will enable increased opportunities for housing choice and	This option will enable increased opportunities for housing choice and	This option will enable increased opportunities for housing choice and

	Option 1 – Status quo: Business – Mixed Use zone Building Height standard	Option 2 – Business – Mixed Use zone Building Height standard proposed under PC78 (21m total building height)	Option 3 – Proposed Plan Change: total building heights of 27m and 21m.	Option 4 – Total building height of 32.5m
	zoning, which may be perceived by some members of the community as a benefit.	employment on highly accessible land, though not to the same extent as Option 3 or 4.	employment on highly accessible land, though not to the same extent as Option 4.	employment on highly accessible land to the greatest extent.
<i>Cultural</i>	There is no change to the cultural environment through this option	There is no change to the cultural environment through this option as the total allowable building height will not protrude the maunga viewshaft.	There is no change to the cultural environment through this option as the total allowable building height will not protrude the maunga viewshaft.	This option does not facilitate any improved cultural outcomes.
<b>Costs</b>				
<i>Environmental</i>	This option has the potential to detract from the visual quality and cohesiveness of the urban built form, as it will provide for lesser building heights than all immediately adjacent land, where building heights of at least 21m are required to be enabled in order to give effect to the intensification directions of the NPS-UD.	This option provides for greater building heights than the immediately adjacent land under the operative AUP. However, it is anticipated that building height within these surrounding areas will be increased to at least 21m to give effect to the intensification directions of the NPS-UD.	This option provides for a greater building height within the northern part of the Plan Change area, which has the potential to create adverse visual and dominance effects. However, the Landscape Visual Assessment included at <b>Appendix 10</b> concludes that the heights proposed within the Plan Change area will generate low visual effects due to the size of the Plan Change area, proximity to the Glen Innes Town Centre, and surrounding	This option has the potential to detract from the Glen Innes Town Centre located adjacent to the north as a focal point for the community, as there will be no differentiation in building height between the Plan Change area and Town Centre.

	Option 1 – Status quo: Business – Mixed Use zone Building Height standard	Option 2 – Business – Mixed Use zone Building Height standard proposed under PC78 (21m total building height)	Option 3 – Proposed Plan Change: total building heights of 27m and 21m.	Option 4 – Total building height of 32.5m
			landscape elements, including vegetation.	
<i>Economic</i>	This option will enable less development potential than the operative Light Industry zoning under the AUP and creates opportunity cost for the efficient use of highly accessible land.	This option has the potential to create costs to future applicants wanting to build higher and larger scale buildings, particularly within the northern part of the Plan Change area, which is immediately adjacent to the Glen Innes Town Centre where a greater scale of development is anticipated through a 32.5m height variation control.	Increased building heights will incur high construction costs due to structural engineering and fire-rating standards, however, greater building heights allow these costs to be spread across a greater number of dwellings and commercial tenancies.	Increased building heights will incur high construction costs due to structural engineering and fire-rating standards, however, greater building heights allow these costs to be spread across a greater number of dwellings and commercial tenancies.
<i>Social</i>	This option does not make the most efficient use of land and therefore may not result in development yields to support the needs of the community.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the expectations given the current maximum building height of 20m.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the expectations given the current maximum building height of 20m.	The scale of development delivered through this option may be considered by some members of the community to not be in keeping with the expectations given the current maximum building height of 20m.
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option as the total building	There is no change to the cultural environment through this option as the total building height will not	This option will enable building heights greater than the regional and local maunga viewshaft height

	Option 1 – Status quo: Business – Mixed Use zone Building Height standard	Option 2 – Business – Mixed Use zone Building Height standard proposed under PC78 (21m total building height)	Option 3 – Proposed Plan Change: total building heights of 27m and 21m.	Option 4 – Total building height of 32.5m
		height will not protrude the maunga viewshaft.	protrude the maunga viewshaft.	contour, which has the potential to adversely affect cultural values, however, buildings exceeding the maunga viewshaft height contour are managed separately under Chapter D14 of the AUP.
<b>Summary</b>	<p>Option 3 is the preferred option. Proposed building heights of 27m and 21m within the Plan Change area is the most appropriate mechanism to achieve the objectives because:</p> <ul style="list-style-type: none"> <li>• In accordance with Objective B2.2.1(1) and B2.3.1(1), this option will facilitate productivity and urban growth, a diverse mix of choice and opportunity for people and communities, and the efficient use of existing infrastructure;</li> <li>• In accordance with Objective B4.3.1(1), this option will not adversely affect public views to and between Auckland’s maunga;</li> <li>• In accordance with Objective H13.2(2), this option will facilitate urban form that reinforces the Glen Innes Town Centre as the focal point for the community.</li> </ul>			

### 8.3.3 Theme 3: Integrated and High Quality Development

#### 8.3.3.4 Overview

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

- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.3.1(3) The health and safety of people and communities are promoted.
- IX.2(1) The Pilkington Park Precinct is comprehensively developed as a high-quality mixed-use centre which is well-designed and integrated with the surrounding area.
- IX.2(2) New buildings respond to and positively contribute to the amenity values of the public space network including open spaces and streets
- IX.2(3) Development provides for an efficient use of land to deliver residential and commercial activities in proximity to existing centres, and public and active modes of transport.
- IX.2(4) Activities sensitive to noise located adjacent to the rail corridor are designed to protect people's health and amenity values, and in a way which does not unduly constrain the operation of the North Island Main Trunk Line.

The proposed precinct provisions apply a number site specific provisions to ensure that future redevelopment of the Plan Change achieves an integrated and high quality development. In particular, the provisions seek to address the application of the height in relation to boundary plane at the eastern boundary of the site adjoining the Open Space – Informal Recreation zoned land and the management of noise associated with the railway corridor to the west.

In summary, the proposed provisions:

- Exclude the application of the height in relation to boundary plane from the eastern boundary; and
- In accordance with the recommendations identified in the Acoustic Report prepared by Styles Group, (**Appendix 11**), require activities sensitive to noise (as defined in the AUP) and outdoor play areas of daycare centres located within 60m of the rail corridor and arterial roads to achieve bespoke noise standards.
- Include additional assessment criteria for the consideration of new buildings within the Mixed Use zone to ensure that development will be well integrated with the surrounding urban environment.

#### 8.3.3.5 Height in Relation to Boundary

As previously discussed, areas of Open Space zoned land ranging in width from 10m-40 are located between the eastern boundary of the site and legal boundaries of Pilkington Road and Apirana Avenue. This land does not provide for recreational purposes, and functions as an extension of the road corridor. Under Rule H13.6.2((1) and Table H13.6.2.1 of the Mixed Use zone provisions, a



height in relation to boundary plane of 16.5m and 45 degrees will apply between this common boundary. It is considered that the required recession plane will restrict the building heights sought under the Plan Change proposal or may result in resource consent requirements to address a technical non-compliance. Exclusion of this requirement from the eastern boundary is therefore considered to be the most effective and efficient means to achieve the following objectives:

- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.3.1(3) The health and safety of people and communities are promoted.
- IX.2(3) Development provides for an efficient use of land to deliver residential and commercial activities in proximity to existing centres, and public and active modes of transport.

#### 8.3.3.6 Acoustic Treatment

In relation to the proposed noise standards (refer **Appendix 11**), it is considered that the requirement to achieve specific noise levels for noise sensitive activities, including play areas, within close proximity to the railway corridor will provide the greatest design flexibility for future redevelopment. This is because there are a number of design responses that will ensure the required noise levels can be achieved, for example through acoustic screening design or the location, layout, and orientation of buildings. The inclusion of specific noise levels will also provide certainty to all future plan users on appropriate noise levels.

Overall, the proposed provisions are considered to be the most effective and efficient means to achieve the following objective:

- IX.2(4) Activities sensitive to noise located adjacent to the rail corridor are designed to protect people's health and amenity values, and in a way which does not unduly constrain the operation of the North Island Main Trunk Line.

#### 8.3.3.7 Assessment Criteria for New Buildings

The Pilkington Park Precinct seeks to apply the underlying Mixed Use Zone provisions which require restricted discretionary resource consent for new buildings. In addition to these existing matters of discretion and assessment criteria, the Pilkington Park Precinct includes additional provisions to ensure that new redeveloped buildings can be well integrated with and respond positively to features of the existing urban context surrounding the Plan change area. These additional provisions relate to:

- The provisions of quality and attractive frontages to public spaces;
- Whether the design and location of buildings will enable the Pilkington Park Precinct to be comprehensively redeveloped;
- The provision of on-site landscaping;
- The provision of access for pedestrians and cyclists; and
- The provision of connections to the existing public space network.

These additional proposed matters of discretion and assessment criteria address specific design outcomes and considerations that are relevant to the Plan Change area and the existing surrounding urban environment, and is therefore considered to be effective and efficient in achieving the following objectives:

- IX.2(1) The Pilkington Park Precinct is comprehensively developed as a high quality, mixed-use centre which is well-designed and integrated with the surrounding area.
- IX.2(2) New buildings respond to and positively contribute to the amenity values of the public space network including open spaces and streets.

#### 8.3.3.8 Section 32 Evaluation

In determining the most appropriate method for achieving the objectives of the Plan Change, the following practicable options have been considered:

- Option 1 – Status quo: apply the AUP rules and standards under, particularly under chapters E25 Noise and vibration and H13 Business – Mixed use zone.
- Option 2 – Apply bespoke precinct provisions to manage the development of future buildings in relation to the adjacent railway corridor to the west and adjoining Open Space – Informal Recreation zoned land to the east.

**Table 3** below evaluates the options that have been considered to manage future development activities against the requirements of section 32(1)(b). It is considered that the most appropriate option is Option 2, and the Plan Change proposes targeted precinct provisions.

**Table 3: Theme 3: Future development– Evaluation of Options.**

	Option 1 – Rely on Auckland-Wide and Zone provisions	Option 2 – Proposed Plan Change: Apply targeted provisions to manage the development of buildings
<b>Description of option</b>	<p>The development of buildings is managed by the provisions in the underlying Auckland-wide and zone chapters, including E25 Noise and Vibration and H3 Business – Mixed Use zone.</p> <p>Chapter E25 does not include provisions which provide for acoustic treatment and mechanical ventilation considerations where buildings are located within close proximity to the railway corridor.</p> <p>Chapter H13 requires a height in relation to boundary plan to apply to the eastern boundary of the Plan Change area due to the existing strip of Open Space zoned land that forms a part of the road corridor.</p>	<p>The proposed Pilkington Park Precinct includes targeted provisions to manage the development of buildings:</p> <ul style="list-style-type: none"> <li>• An acoustic treatment and mechanical ventilation rule to ensure activities sensitive to noise adjacent to the railway corridor are designed to protect healthy and amenity and manage reverse sensitivity effects;</li> <li>• Exclusion of the height in relation to boundary standard at the eastern frontage of Plan Change area in relation to the land parcels that are zoned Open Space – Informal Recreation Zone;</li> <li>• Matters of discretion and assessment criteria which address the outcomes for new buildings within the Plan Change area and their relationship to the surrounding urban environment; and</li> <li>• Other associated objectives, policies, matters of discretion, and assessment criteria.</li> </ul>
<b>Efficiency and effectiveness in achieving objectives</b>	<p>This option is not efficient and effective at achieving B2.3.1(1) (a) and B2.3.1(3) as it does require building design to respond to the railway corridor adjacent to the site in order to manage reverse sensitivity effects, provide for healthy and safety, or enable these buildings to be maintained safely within their site boundaries.</p>	<p>This option is efficient and effective at achieving B2.3.1(1)(a) and B2.3.1(3) as it will apply planning provisions targeted to the specific qualities and characteristics of the site and surrounding area to manage the design and location of future buildings, and reverse sensitivity effects, while providing for health and safety.</p>
<b>Benefits</b>		
<i>Environmental</i>	<p>The bulk and location of new buildings are controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide and zone provisions, and will ensure that future development</p>	<p>The targeted provisions proposed within the Pilkington Park Precinct will ensure future development responds to the site specific characteristics and features of the existing surrounding urban environment. In particular, rules in relation to acoustic treatment within close proximity to</p>

	Option 1 – Rely on Auckland-Wide and Zone provisions	Option 2 – Proposed Plan Change: Apply targeted provisions to manage the development of buildings
	achieves the anticipated built form outcomes for the Mixed Use zone.	the railway corridor and arterial roads will manage potential effects on future residents and users.
<i>Economic</i>	This option relies on operative AUP provisions, resulting in a less complex set of planning provisions within the Plan Change area.	The targeted provisions for height in relation to boundary recognise the specific characteristics of the Plan Change area and surrounding environment, and reduce barriers to development that would restrict capacity or incur additional costs associated with obtaining resource consent.
<i>Social</i>	This option retains existing AUP provisions and community expectations are maintained.	This will ensure that future buildings are designed to protect against the health and amenity of future residents and users.
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Costs</b>		
<i>Environmental</i>	There is no requirement to design new buildings to provide for the maintenance of the railway corridor or ensure reverse sensitivity effects in relation to the operation of the railway can be managed.	This option will exempt future buildings within the Plan Change area from the height in relation to boundary plane at the eastern boundary of the site where it adjoins the Open Space – Informal Recreation zone. This has the potential to create adverse visual, dominance, and shading effects. However, the Open Space zoned land forms part of the road reserve and does not have a recreational function, and the difference in built form outcomes enabled (as shown at <b>Appendix 3</b> ) will enable the efficient use of this land without creating adverse visual dominance effects to Apirana Avenue. The height in relation to boundary requirements under the Mixed Use zone will continue to apply in relation to all other site boundaries and adjoining sites.
<i>Economic</i>	The requirement to comply with a height in relation to boundary plane at the eastern boundary of the Plan	Acoustic treatment and mechanical ventilation requirements will incur additional development costs,

	Option 1 – Rely on Auckland-Wide and Zone provisions	Option 2 – Proposed Plan Change: Apply targeted provisions to manage the development of buildings
	Change area adjoining open space zoned land will reduce redevelopment capacity or incur additional resource consent processing costs associated with a ‘technical’ infringement.	however will provide for the health and amenity of future residents and users.
<i>Social</i>	This option does not include a planning provision to ensure that future buildings will be designed to protect against the health and amenity of future residents or users.	This option will not result in any social costs.
<i>Cultural</i>	There is no change to the cultural environment through this option.	There is no change to the cultural environment through this option.
<b>Summary</b>	<p>Option 2 is the preferred option. Applying targeted provisions to the Plan Change area is the most appropriate mechanism to achieve the objectives because:</p> <ul style="list-style-type: none"> <li>• In accordance with B2.3.1(1), it will ensure that future buildings respond to the qualities and characteristics of the site and area to manage environmental effects; and</li> <li>• In accordance with B2.3.1(3), it will promote the health and safety of people and communities by requiring appropriate acoustic treatment and mechanical ventilation for buildings within close proximity to the railway corridor.</li> </ul>	

## 8.4 Risk of Acting or Not Acting

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

## 8.5 Section 32 Assessment Conclusion

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

- The proposed objectives in the Pilkington Park Precinct are considered to be the most appropriate way to achieve the purpose of the RMA by applying a suite of targeted planning provisions to enable appropriate redevelopment of the site;
- The proposed provisions are considered to be the most efficient and effective means of facilitating the use and redevelopment of the Plan Change area; and
- The proposed provisions are the most appropriate way to achieve the objectives of the AUP and the proposed precinct, having regard to their efficiency or effectiveness and the costs and benefits anticipated from the implementation of the provisions.

## 9.0 Conclusion

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This report has been prepared in support of Wyborn Capital's request for a Plan Change to the provisions of the AUP (OP) to enable mixed-use development at 167-173 Pilkington Road, Point England.

The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the RMA.

Based on the assessment of environmental effects, as supported by specialist analysis, it is concluded that the proposed Plan Change will have positive effects on the environment in terms of the social and economic well-being of the community. Potential adverse effects are able to be managed through the application of the AUP (OP) zone and Auckland-wide provisions.

An evaluation in terms the provisions of section 32 of the RMA is provided in Section 8 of this report. This includes an analysis of the extent to which the objectives of the plan change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the plan change are the most appropriate way to achieve the objectives.

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