

Request for Private Plan Change

Proposed Plan Change: Whenuapai Business Park

Neil Construction Limited

For land at 69-73 & 94-96A Trig Road and 141, 145, 151, 153, 155-157, 159 & 163
Brigham Creek Road, Whenuapai

Prepared by:

Philip Brown
Director
Campbell Brown Planning Ltd

Michelle Kemp
Principal Planner
Campbell Brown Planning Ltd

Isobel Lee
Intermediate Planner
Campbell Brown Planning Ltd

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Table of Contents

1.0	Executive Summary	6
2.0	Private Plan Change Applicant and Property Details	8
3.0	PPC land Location	10
4.0	PPC land Context	12
4.1	The Private Plan Change Land	12
4.1.1	94, 96 & 96A Trig Road	12
4.1.2	69, 71 & 73 Trig Road and 151 & 155-157 Brigham Creek Road.....	13
4.1.3	141, 145, 153 & 159 Brigham Creek Road.....	13
4.2	Hydrology	14
4.3	Ecology	15
4.4	Infrastructure	16
4.5	Earthworks Consents.....	16
4.5.1	69 Trig Road and 151, 155-157 Brigham Creek Road.....	16
4.5.2	71 Trig Road.....	16
4.5.3	73 Trig Road.....	17
4.5.4	94 Trig Road.....	17
4.6	Surrounding Environment	18
4.6.1	Adjacent sites	18
4.6.2	Whenuapai Township.....	19
4.6.3	Westgate	19
4.6.4	Hobsonville	19
4.6.5	Special Housing Areas.....	20
4.6.6	Plan Changes	21
5.0	Planning Controls	22
5.1	Zoning	22
5.2	Overlays & Controls.....	22
5.3	Designations	24
6.0	Project Background	27
6.1	Strategic History of Auckland’s North-West.....	27
6.2	Whenuapai Structure Plan	27
6.3	Proposed Plan Change 5.....	29

6.4	Fast Track Consent Application	31
6.5	Notice of Requirements	31
7.0	Land Supply Documents	33
7.1	Future Urban Land Supply Strategy	33
7.2	Future Development Strategy	33
8.0	Private Plan Change Request.....	35
8.1	Introduction.....	35
8.2	The vision for the PPC land.....	35
8.3	Requirements of the Act	36
8.4	Nature and Purpose of the PPC.....	38
8.5	PPC Conclusion	41
9.0	Section 32 Evaluation	42
9.1	Scope and Purpose	42
9.2	Evaluation of the Objectives.....	43
9.3	Development of Options	45
9.4	Evaluation of Options	46
9.5	Risk of Acting or Not Acting.....	52
9.6	Overall Conclusions of s32 Evaluation.....	53
10.0	Resource Management Framework.....	54
10.1	Introduction.....	54
10.2	Part 2 of the RMA.....	54
10.3	Other Relevant Sections of the RMA.....	56
10.4	National Policy Statements	57
10.4.1	National Policy Statement on Urban Development 2020 (Updated May 2022)	57
10.4.2	The National Policy Statement for Freshwater Management.....	60
10.4.3	The National Policy Statement for Indigenous Biodiversity	61
10.4.4	New Zealand Coastal Policy Statement.....	61
10.5	National Environmental Standards	61
10.6	National Planning Standards	61
10.7	The Auckland Plan (2018).....	62
10.8	Future Development Strategy 2023	63

10.9	The Whenuapai Structure Plan	64
10.10	The Auckland Unitary Plan – Regional Policy Statement	66
10.11	The Auckland Unitary Plan – Objectives and Policies.....	72
10.11.1	Zoning: H17 Business – Light Industry Zone	72
10.11.2	Chapter E – Auckland-wide Provisions	73
10.12	Conclusion regarding the Statutory Framework	78
10.13	Other Relevant Planning Documents	78
10.13.1	Upper Harbour Local Board Plan 2020	78
10.13.2	Upper Harbour Greenways Plan.....	79
11.0	Environmental Effects	81
11.1	Ecological Effects	81
11.2	Acoustic Effects	84
11.3	Transport Effects	85
11.3.1	Travel pattern effects	87
11.4	Effects on Mana Whenua	89
11.4.1	Iwi Management Plan.....	95
11.5	Economic Effects	97
11.6	Flooding Effects	98
11.7	Infrastructure Effects.....	100
11.7.1	Stormwater.....	101
11.7.2	Wastewater	102
11.7.3	Water supply	103
11.7.4	Earthworks Effects.....	104
11.7.5	Infrastructure Conclusion	105
11.8	Land Stability and Geotechnical Effects	105
11.9	Contamination Effects	106
11.10	Archaeological Effects	106
11.11	Urban Design Effects	107
11.12	Character and Visual Amenity Effects	109
11.13	Reverse Sensitivity Effects.....	111
11.14	Overall Environmental Effects Conclusion	112
12.0	Consultation	113

13.0 Conclusion113

List of Appendices

Appendix A:	Ecological Impact Assessment (Viridis)
Appendix B:	Bulk Earthwork Consents
Appendix C:	Acoustic Report (Marshall Day Acoustics)
Appendix D:	Integrated Transport Assessment (Team Consultants)
Appendix E:	Proposed Zoning Plan
Appendix F:	Proposed Whenuapai Business Park Precinct Provisions
Appendix G:	Proposed Precinct Plan
Appendix H:	Proposed Staging Plan
Appendix I:	Consultation Summary
Appendix J:	Economic Assessment (Insight Economics)
Appendix K:	Flood Risk Hazard Report (Cato Bolam)
Appendix L:	Transport Peer Review (Don McKenzie Consultants)
Appendix M:	Engineering Peer Reviews (MPS Limited)
Appendix N:	Stormwater Management Plan (Cato Bolam)
Appendix O:	Infrastructure Report (Cato Bolam)
Appendix P:	Geotechnical Assessment Report (CMW Geosciences)
Appendix Q:	Site Investigation Report (Geosciences)
Appendix R:	Archaeological Assessment Report (Clough & Associates)
Appendix S:	Urban Design Report (Ian Munro)
Appendix T:	Landscape Visual Assessment (Sola Landscape Architects)
Appendix U:	Fast-track Consent Cultural Impact Assessment
Appendix V:	Future Tie In Drawings
Appendix W:	Designation 4311 Contours Map
Appendix X:	Stream Condition Assessment
Appendix Y:	Stream Erosion Assessment

Document Control Record

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Client: Neil Construction Limited
Project Location: Whenuapai, Auckland
Project Reference: 2795WPC23

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1.0 Executive Summary

This Private Plan Change request ('PPC') seeks to make changes to the Auckland Unitary Plan – Operative in Part ('AUP') to enable the rezoning of multiple land holdings collectively referred to as Whenuapai Business Park ('WBP') or the 'PPC land'. WBP comprises an approximate land area of 47.5 ha over 12 properties.

The request seeks to rezone the PPC land from Future Urban Zone ('FUZ') to Business – Light Industry Zone ('LIZ'). The PPC seeks to apply a new Whenuapai Business Park Precinct over the PPC land. The proposal is intended to enable a light-industrial business area to be established to support business and employment opportunities in Whenuapai and the wider north-west area by providing land suitable for a range of business activities, including land extensive activities, that are serviced by key transport routes and are connected to surrounding residential areas. Auckland, particularly the north-west, has an historic lack of vacant industrial land suitable for land-extensive industrial activities and, in order to support the growth of Auckland through providing employment opportunities within close proximity to key infrastructure, enabling the provision of further industrial land is considered vital to achieving this and creating a well-functioning urban environment.

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

The section 32 analysis has confirmed that the proposed Precinct plan approach is appropriate for the PPC land. Through that evaluation, it has been determined that enabling industrial development is more appropriate than the status quo, rezoning of the land to LIZ without a Precinct, or any alternative zoning or spatial area.

WBP is located in an area within close proximity of key transport links, such as State Highways 16 and 18, that provide strategic connections to the wider Auckland region and are identified as being on the strategic freight network. In addition to being adjacent to the Whenuapai Cable Landing Station, one of the key termination points for the Southern Cross internet cable, the PPC land is also located within the Westgate node, an area that contains extensive commercial and retail activities that will be further supported and complemented by the provision of Light Industry-zoned land.

The anticipated population growth of Whenuapai and the surrounding north-west area will need to be supported by not just housing, but also employment and business opportunities to reduce dependence on long distance commuting and support the economic vitality of the local area. WBP is considered to assist in achieving these outcomes, whilst also enhancing the ecological, social, and cultural values of the area.

The request has been carefully designed to consider the ecological features of the PPC land, such as the streams and wetlands, and will enhance these features from their current state via extensive native planting and restoration, as well as implementing a comprehensive stormwater management approach to protect both the PPC land and the surrounding environment.

A comprehensive assessment of environmental effects potentially generated by the PPC has been carried out. Any adverse effects generated by the PPC will be minor and satisfactorily mitigated and will achieve significant positive effects from the type of development that would be enabled. These assessments demonstrate that the proposed Whenuapai Business Park Precinct and the Light Industry zoning are the most appropriate way to achieve the envisaged outcomes for the PPC land.

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

2.0 Private Plan Change Applicant and Property Details

Applicant:	Neil Construction Limited
Address for Service:	C/- Campbell Brown Planning Limited P O Box 147001 Ponsonby AUCKLAND 1144 Attention: Philip Brown / Michelle Kemp Email: philip@campbellbrown.co.nz or michelle@campbellbrown.co.nz <i>(all written correspondence via email please)</i>
PPC land Location:	<i>See following page for schedule of addresses</i>
Legal Description:	<i>See following page for schedule of addresses</i>
PPC land Area:	<i>See following page for schedule of addresses</i>
Current Unitary Plan Zoning:	Future Urban Zone
Unitary Plan Overlays:	Natural Resources: High-Use Aquifer Management Areas Overlay – Kumeu Waitemata Aquifer Infrastructure: Aircraft Noise Overlay – Whenuapai Airbase – noise control area (55dBA) & (65dBA)
Controls:	Macroinvertebrate Community Index – Rural
Designations:	Airspace Restriction Designations – ID 4310 & 4311, Defence purposes – protection of approach and departure paths (Whenuapai Air Base), Minister of Defence

Address	Legal Description	Site Area	Registered Owner
69 Trig Road	Lot 5 & 3 DP 101583	5.71 ha	Neil Construction Ltd
71 Trig Road	Lot 5 & 3 DP 101583 / Lot 2 DP 117365	6.98 ha	Neil Construction Ltd
73 Trig Road	Lot 1 DP 117365	2.61 ha	Neil Construction Ltd
94 Trig Road	SECT 2 SO 528987	3.23 ha	Neil Construction Ltd
96 Trig Road	Lot 1 DP 590594	4.04 ha	M & R Patten
96A Trig Road	Lot 2 DP 590594	4.01 ha	M & C Laurie
141 Brigham Creek Road	Lot 1 DP 169384	6.49 ha	Chin-Jung Hou & Jung-Li Chuang
145 Brigham Creek Road	Lot 1 DP 114117	2,558 m ²	Wen Jing Chen and Yu Jin Wu
151 Brigham Creek Road	Lot 4 DP 101583	6.13 ha	Neil Construction Ltd
153 Brigham Creek Road	Lot 1 DP 334953	1.36 ha	Spark New Zealand Trading Ltd
155-157 Brigham Creek Road	Lot 2 DP 334953	3.62 ha	Neil Construction Ltd
159 Brigham Creek Road	Lot 1 167537	2.63 ha	W & P Matthews, K Walker, & D Nicoll

Table 1: Schedule of properties within the WBP

3.0 PPC land Location

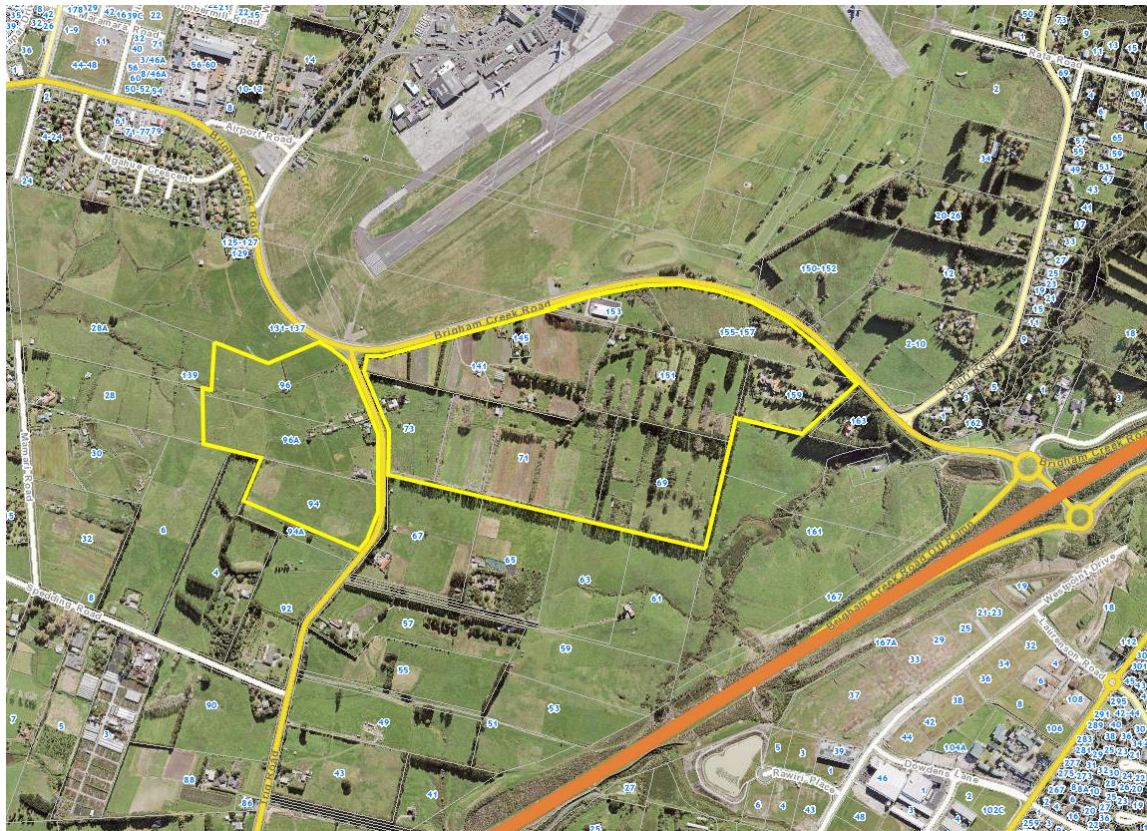


Figure 1 - PPC location

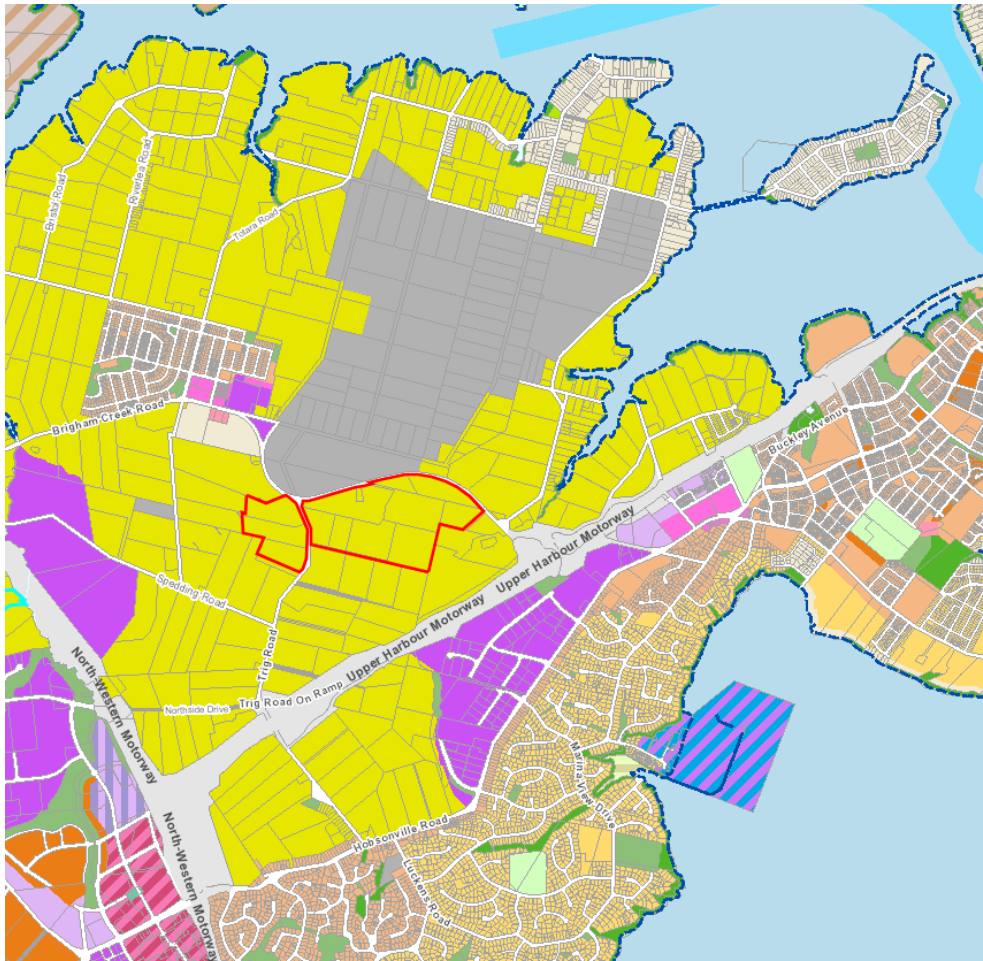


Figure 2 - PPC location within the wider surrounding area

4.0 PPC land Context

4.1 The Private Plan Change Land

The PPC land contains 12 separate properties that are predominantly owned or controlled by the applicant. Other owners are identified in Table 1. All 12 properties are combined to form the PPC land that comprises the plan change request and are summarised below.

4.1.1 94, 96 & 96A Trig Road

These three properties have a combined area of 11.28 ha and are located on the western side of Trig Road, which separates these properties from the remainder of the WBP (refer to **Figure 3** below). The properties are currently used for farming and/or lifestyle residential. Both 96 and 96A contain residential dwellings as well as multiple ancillary outbuildings. 94 Trig Road is a vacant site. The properties are predominantly free from vegetation (other than grass) and, with regard to topography, have a slight fall to the north-east. All three properties have frontage on to Trig Road, with 96 Trig Road also having a portion of frontage on to Brigham Creek Road. The most southern of the three properties is owned by the applicant, while the owners of the other two properties have consented to their land being included in the PPC and support the PPC.



Figure 3 - 94, 96 & 96A Trig Road, Whenuapai outlined in yellow (remainder of PPC land directly to the east of Trig Road)

4.1.2 69, 71 & 73 Trig Road and 151 & 155-157 Brigham Creek Road

The properties at 69-73 Trig Road form the southern area of the PPC land and have a total site area of 15.3ha. 73 Trig is in pasture and contains pockets of vegetation, as well as an existing vacant dwelling and ancillary outbuildings towards the north-western corner. The topography of the property is generally consistent, with a slight fall from the south down to the north. Both 71 and 69 Trig Road are rear sites with access provided via accessways adjacent to the southern boundary of the PPC land. 73 Trig Road has frontage on to Trig Road.

The Brigham Creek Road properties have a combined area of 9.75 ha and are located towards the northern end of the PPC land, with 155-157 Brigham Creek Road forming the northern boundary of the PPC land. An existing entrance strip serves 151 Brigham Creek Road. These properties are owned by the applicant.



Figure 4 - 69, 71 & 73 Trig Road and 151 & 155-157 Brigham Creek Road

4.1.3 141, 145, 153 & 159 Brigham Creek Road

The properties are located to the north-west and north-east of the PPC land and have a combined area of 9.38ha. Both 145 and 159 Brigham Creek Road contain existing residential dwellings and moderate levels of vegetation. 141 Brigham Creek Road is used for farming purposes and contains a residential dwelling, as well as ancillary outbuildings. All three properties are accessed off Brigham Creek Road and have varying topography. The applicants

do not own these properties but have agreement from the owners that the sites can be included in the PPC.

153 Brigham Creek Road has a total area of 1.36 ha. The site is owned by Spark New Zealand Trading Limited and contains the Whenuapai Cable Landing Station, which houses one of the key termination points for the Southern Cross internet cable owned by Spark. The applicant has in-principal support from Spark to include the site within the PPC and is engaged in ongoing communication to address Spark’s requirements.



Figure 5 - 141, 145, 153 and 159 Brigham Creek Road

4.2 Hydrology

The Auckland Council GIS viewer shows multiple overland flow paths ('**OLFP**') throughout the PPC land. With regard to the area of the PPC land to the east of Trig Road, the existing OLFPs, as well as other OLFP's from the surrounding area to the east, merge to form a single OLFP. The merged OLFP then forms an unnamed tributary that discharges to the Waiarohia Stream (refer to **Figure 6** below). Flood plains are predominantly limited to the OLFP's on the PPC land, with some additional ponding on 141 Brigham Creek Road.

With regard to the western Trig Road properties, the area is subject to multiple OLFPs that terminate within the properties or traverse through the properties to connect to Trig Road. Flood plains are predominantly limited to the western side of 96 and 96A Trig Road.



Figure 6 - Catchments and Hydrology of the PPC land

4.3 Ecology

There are a number of ecological features that have been identified within the PPC land, as shown by the following figure (refer to Ecological Impact Assessment in **Appendix A** for further details):



Figure 7 - Ecological features within the PPC land

The main waterway is located in the north-eastern corner of the PPC land and is an unnamed tributary of the Waiarohia Stream. The stream includes some existing native riparian vegetation, but generally contains rank grass and other exotic vegetation. The other permanent stream

identified, waterway 15 on **Figure 7** above, is located outside of the PPC to the west but its catchment includes the PPC land.

A number of intermittent waterways are located across the PPC land, predominantly flowing into the identified permanent waterways, and a number of artificial drains are also located across the PPC land. Two constructed ponds are present along the unnamed tributary of the Waiarohia stream.

Two natural inland wetlands have been identified in the northern portion of the PPC land and are located along the unnamed tributary of the Waiarohia stream. Additional wetlands are located in the western part of the PPC land, and a further wetland is located just outside of the PPC to the west.

4.4 Infrastructure

The PPC land contains no existing stormwater network, with the sites draining naturally to the existing gullies and streams. An existing pump station is located on the eastern side of the Waiarohia Stream off Brigham Creek Road, outside the PPC area, and an existing wastewater line traverses the southern boundary of the PPC land. Existing wastewater infrastructure within the PPC land is limited to on-site septic systems. Existing potable water connections are located within Brigham Creek and Trig Road carriageways, as well as existing power and telephone services.

4.5 Earthworks Consents

A significant portion of the PPC land is subject to existing earthwork consents that have either been completed or are currently being implemented on the site. Please refer to **Appendix B** for the approved resource consents outlined below. There are no other approved resource consents relevant for the PPC.

4.5.1 69 Trig Road and 151, 155-157 Brigham Creek Road

Resource consent (LUC60350837) was granted on 20 August 2020 to undertake bulk earthworks. The consented earthworks were undertaken in 2021/2022 and comprise a total volume of 96,400 m³ (cut of 48,200 m³, fill of 48,200 m³) undertaken over an area of 11.69ha. The purpose of the consented works was to level the site to form the foundations for future subdivision, associated infrastructure, and future roading required to service future development.

4.5.2 71 Trig Road

Resource consent (LUC60376543 – District and Regional) was granted on 29 November 2021 to undertake large scale earthworks comprising 51,500m³ of land disturbance over an area of

6.7ha. Consent under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ('NESC') was also granted for the disturbance, removal and disposal of contaminated soil containing petroleum hydrocarbons.

4.5.3 73 Trig Road

Resource consent (BUN60410316) was granted on 29 May 2023 to undertake large scale earthworks and included both district and regional earthwork consents. The consented earthworks comprise a total volume of 27,658 m² and 33,547 m³. The consent also included a water permit for the dewatering and groundwater level control associated with the groundwater diversion for the proposed earthworks.

4.5.4 94 Trig Road

Resource consent (BUN60395603) was approved on 11 July 2022 to undertake bulk earthworks on the site and included both district and regional consents. The consented works comprise of a total area of 32,900 m² and a total volume of 24,000 m³. The approved consent also included a water permit for the dewatering and groundwater level control associated with groundwater diversion due to the proposed earthworks.

The following figures show the locations of each of the approved consents within the PPC land and a recent aerial photograph showing the extent of earthworks undertaken:



Figure 8 - Approved resource consents within the PPC land



Figure 9 - Earthworks within the PPC land

4.6 Surrounding Environment

As will be made evident by the following sections, it is considered that the wider Whenuapai area has and is still undergoing a significant degree of change from a rural area to a state of semi-urbanisation and, in some areas, complete urbanisation. Whilst some land surrounding the PPC land is still in a semi-rural state, land is either anticipated to be urbanized or has already been urbanized. This is evident from the considerable level of urbanisation that has occurred over the past 20 years between Massey North/Westgate and Hobsonville, which reflects a consistent process of urban rezoning in the north-west part of the region. Whenuapai is considered to be the next logical step for urbanisation in the north-west, as outlined in several key strategic documents referenced in this report.

4.6.1 Adjacent sites

The immediate surrounding environment is characterised by both rural and residential activities. The eastern, southern, and western boundaries of the PPC land border rural-residential properties that are occupied by dwellings and/or used for rural activities, such as pasture.

The sites directly to the east of the subject land, 161 and 163 Brigham Creek Road and to the south, 92 Trig Road and 4 Spedding Road, are owned by Auckland Council and will be developed as recreation reserves in the future. The Waiarohia Stream runs through the Council-owned land at 161 and 163 Brigham Creek Road.

Brigham Creek Road forms the northern boundary of the PPC land and separates the area from the Royal New Zealand Air Force ('RNZAF') Base Auckland also known as the Whenuapai Air Base, directly to the north. The RNZAF Base Auckland is a prominent feature of the Whenuapai

landscape and community and has a number of designations in place to protect and enable its operations. RNZAF Base Auckland contains three runways (including associated vacant land), hangars and terminal buildings, barracks, housing and sports and conference facilities.

4.6.2 Whenuapai Township

To the north-west of the PPC land is the Whenuapai township, an emerging suburb of Auckland with a coastal backdrop of the Upper Waitemata Harbour to the north. Whenuapai is well connected to the wider Auckland region via State Highway 16, connecting to northwest Auckland, and State Highway 18 connecting to Albany and State Highway 1.

Historically a rural village on the outskirts of Auckland, Whenuapai is now one of the Northwest's fastest growing areas. The WSP was developed by Auckland Council in 2016 and sets out the framework for how the area is to transform into an urbanised community with 5,000 new homes, a range of employment precincts and a new town centre.

The existing Whenuapai local centre is located approximately 1.6 km to the northwest from the PPC land and contains a range of services and amenities such as schools, food and retail stores, and community facilities. The WSP anticipates that this centre will grow significantly to sufficiently service the envisaged residential development in the area.

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

4.6.3 Westgate

Westgate Centre is located to the southwest of the PPC land on the western side of State Highway 16. It is a growing metropolitan centre that provides a range of services and amenities for Whenuapai and the wider surrounding area, including retail, commercial and community services. The centre is well connected to the wider Auckland region via key transport links.

The Westgate centre also includes some limited industrial-zoned land which has been developed or is currently under development. Existing uses include a Costco, Mitre 10 Mega, Palmers Garden Centre, paint stores and self-storage facilities.

4.6.4 Hobsonville

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

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

The Hobsonville Corridor Precinct is located between Hobsonville Road and State Highway 18, extending eastwards to Memorial Park Lane at the Hobsonville Domain. The zoning within the precinct is a combination of Business – Mixed Use Zone, Business – Local Centre Zone, Business – Light Industry Zone, Open Space – Informal Recreation Zone, and Open Space – Conservation Zone. The Hobsonville Corridor Precinct area is currently being developed or has been developed for a range of industrial and commercial activities.

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

4.6.5 Special Housing Areas

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

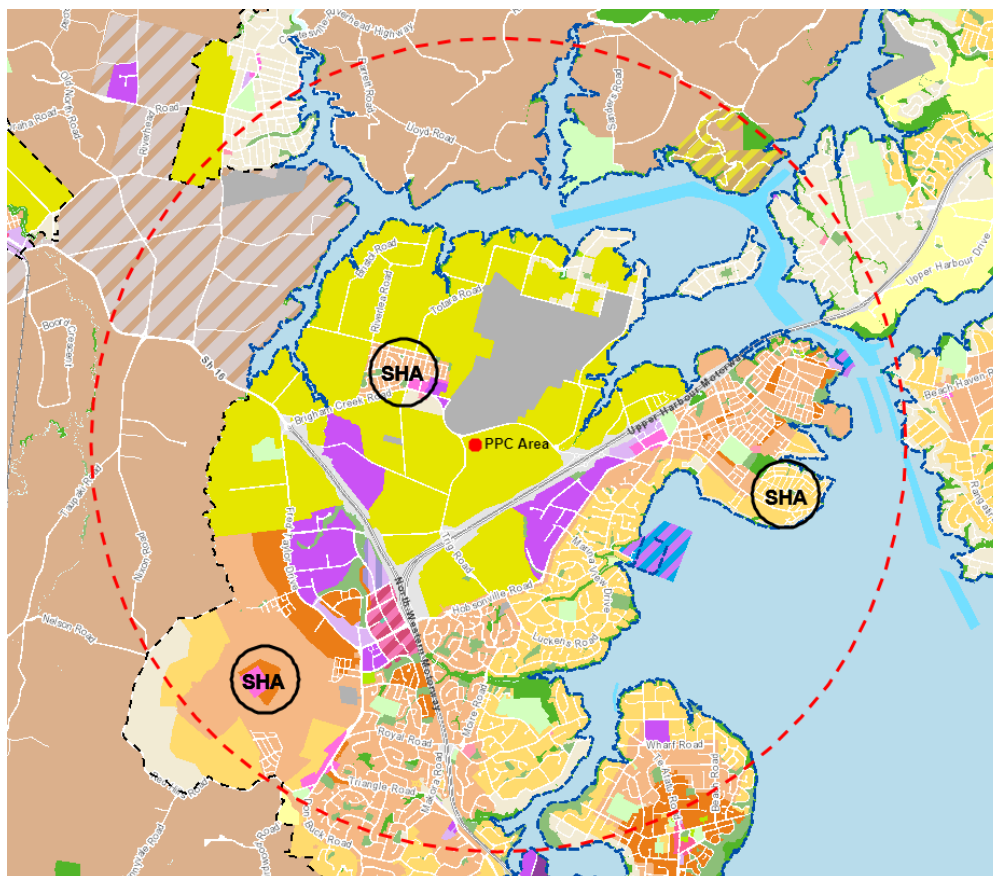


Figure 10 - Special Housing Areas in relation to the PPC land

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

4.6.6 Plan Changes

Additional private plan changes have been approved or are currently being processed in the surrounding Whenuapai area. As shown by the below figure, two plan changes are located within the close proximity to the PPC land.

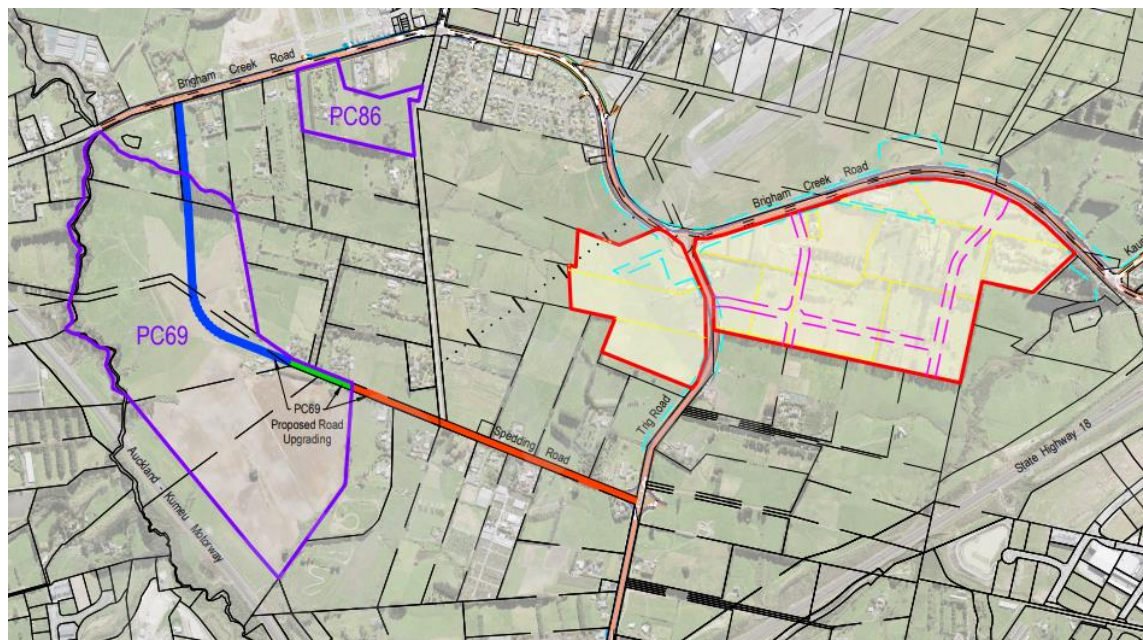


Figure 11 - Nearby plan changes

Plan Change 69 (**'PC69'**) was made operative in March 2023 and rezoned the 52 ha land holding from FUZ to LIZ.

Plan Change 86 (**'PC86'**) was recently approved by Auckland Council and rezoned 5.2 ha of land from FUZ to Residential – Mixed Housing Urban Zone. PC86 was made operative earlier this month.

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

5.0 Planning Controls

5.1 Zoning

The PPC land is currently zoned FUZ. The FUZ applies to greenfield land which is earmarked for urbanisation. Under the FUZ, the land can be used for a range of rural activities but generally cannot be used for urban activities other than those specifically provided for in Table H18.4.1 until rezoning occurs. The below figure shows the PPC land zoning and the zoning of the immediate surrounding area.

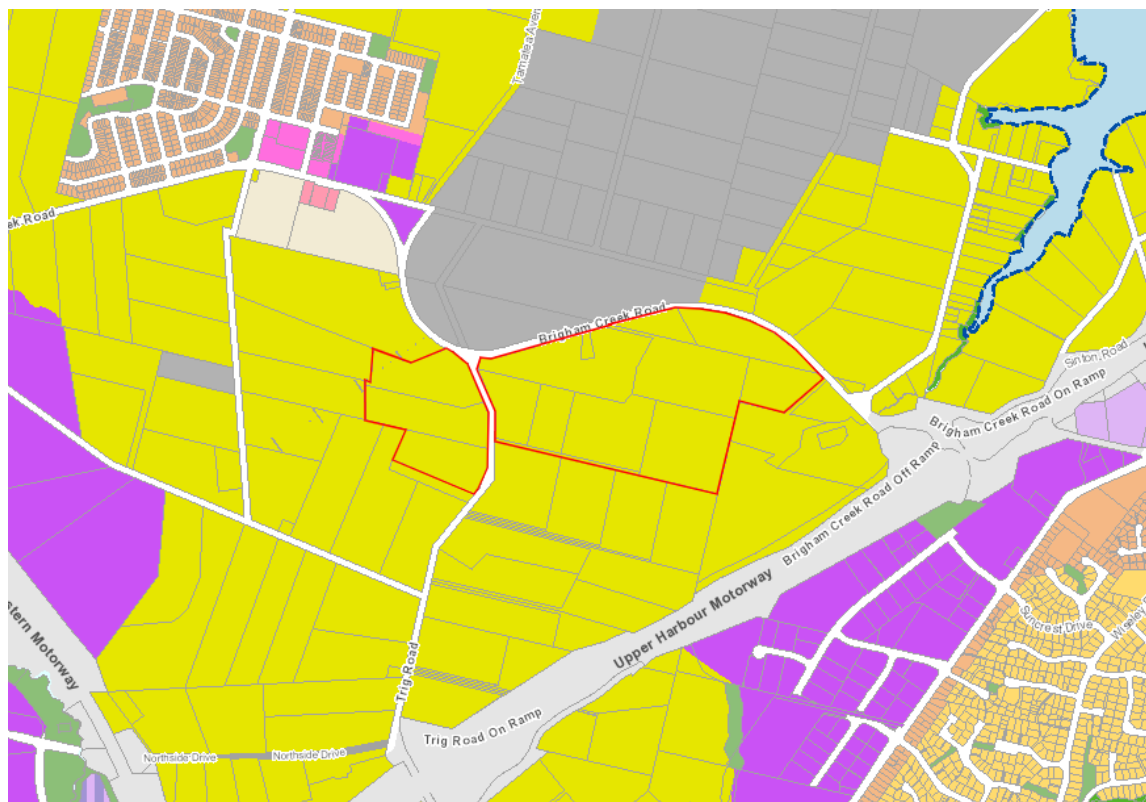


Figure 12 - AUP zoning (FUZ shown in yellow)

5.2 Overlays & Controls

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

- High-Use Aquifer Management Areas Overlay – Kumeu Waitemata Aquifer
- Macroinvertebrate Community Index – Rural

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



Figure 14 - Plan Change 5 draft Variation 1 Engine Testing Noise Contours

5.3 Designations

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

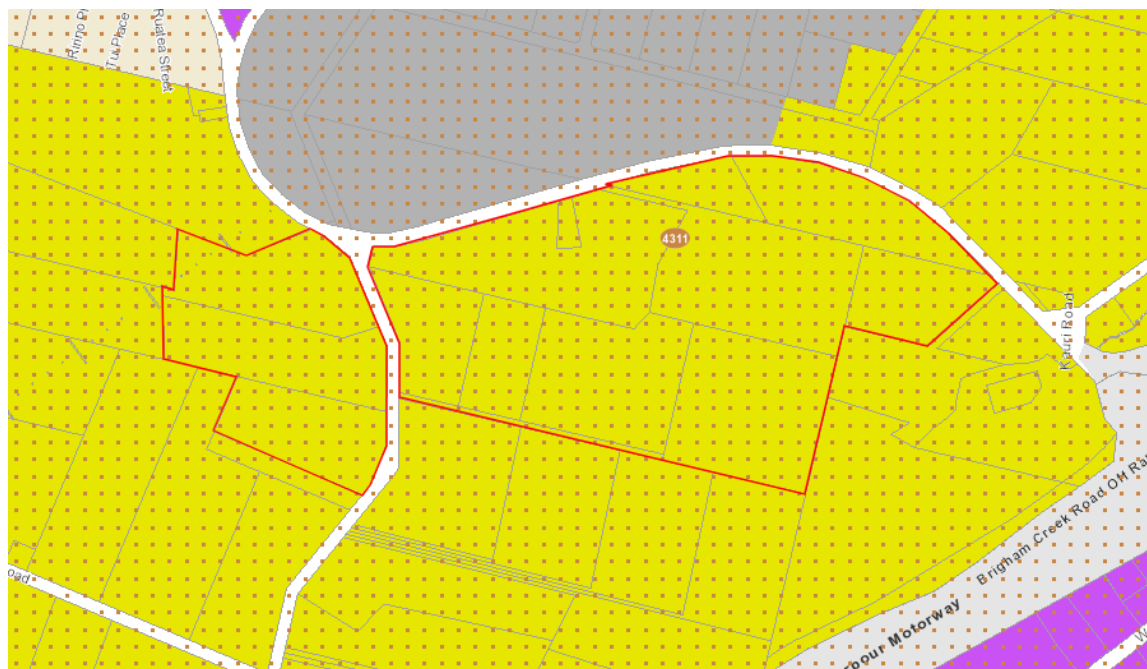


Figure 15 -Designation 4311 covering the Site and surrounding area

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

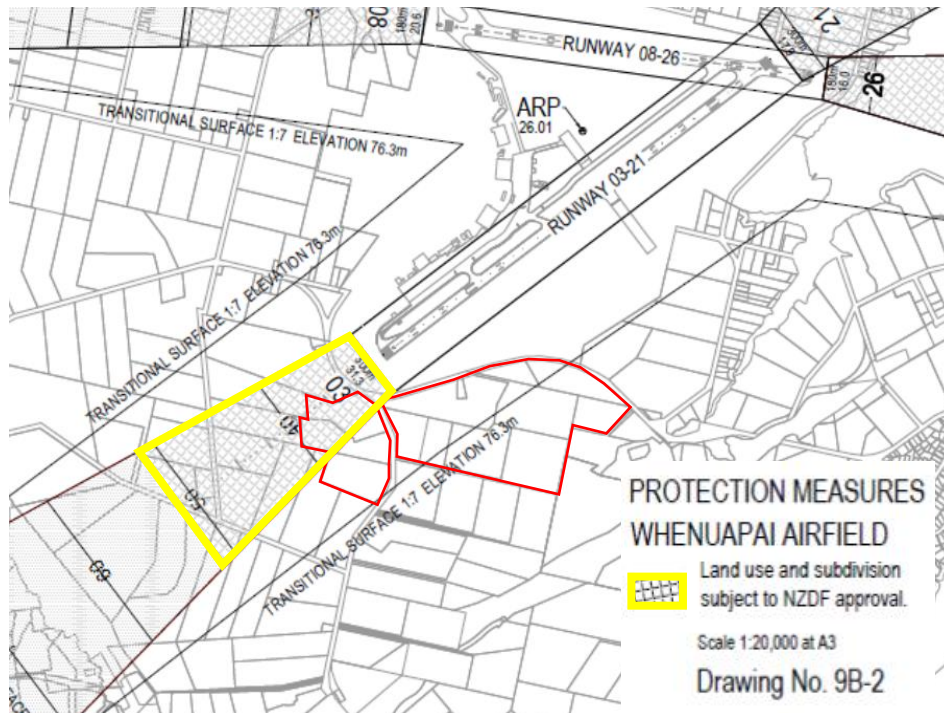


Figure 16 - Land use and subdivision subject to NZDF approval

A portion of the PPC land, the north-west portions of 96 and 96A Trig Road, is located within the area that requires approval from NZDF, with the remainder of the PPC land being located outside the area which requires approval. The relevant conditions on Designation 4311 relating to approvals are reproduced below:

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

A portion of 96 and 96A Trig Road is also subject to Designation – 4310, Defence purposes (Whenuapai Air Base), Designations, Minister of Defence, as shown by the below figure.

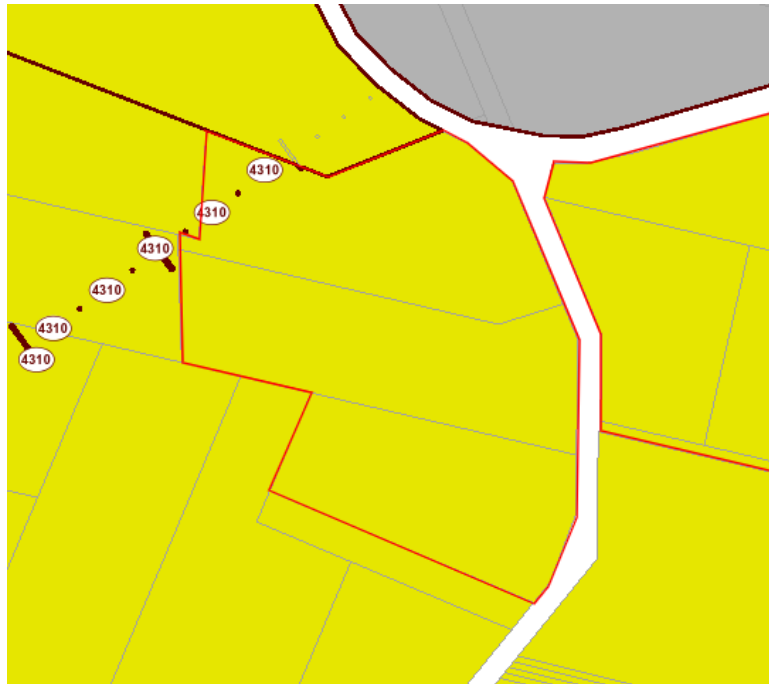


Figure 17 - Designation 4310 in relation to the PPC land

6.0 Project Background

6.1 Strategic History of Auckland’s North-West

The north-west region of Auckland has been earmarked for future urban growth since the late 1990s/early 2000s and a number of strategic documents from the last two decades have shaped the strategies for urban growth in the north-west.

The Auckland Regional Growth Strategy prepared in 1999 identified the area immediately south of Whenuapai, as well as land along Hobsonville Road and at Westgate, as future growth areas. The shortage of business land was acknowledged in both the 1999 Growth Strategy and the 2001 Northern and Western Sectors Agreement. The Northern and Western Sectors Agreement identifies the Brigham Creek Road area as an existing rural area with capacity for future growth.

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

6.2 Whenuapai Structure Plan

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

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

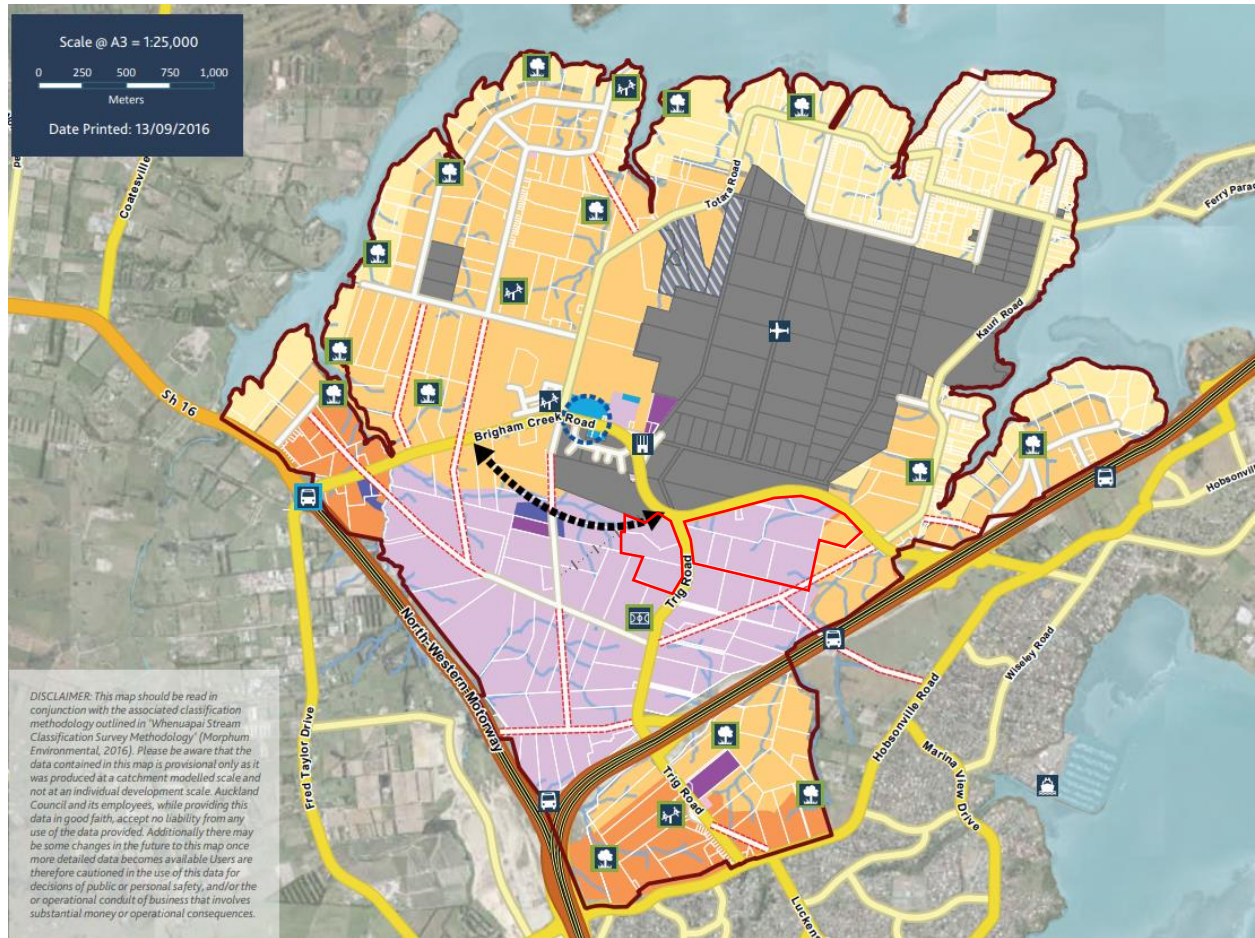


Figure 18 - Whenuapai Structure Plan map (PPC land identified in red)

The PPC land is generally consistent with the land use anticipated by the WSP, being business land uses. The only exception to that land use pattern is the eastern-most portion of the PPC land, which was anticipated to be medium density housing under the WSP. Rezoning this piece of land to residential is not desirable from an urban design perspective given its location between an arterial road and proposed light industry land use.

In addition, land directly to the east of the PPC land has been purchased by Auckland Council for open space purposes, not the envisaged medium density housing under the WSP. Proposing a residential zoning for the PPC land would create an isolated pocket of dwellings within close proximity to business uses and disconnected from other residential areas, and is not considered to be an optimal outcome for the land. The additional business land proposed under the PPC is considered logical and appropriate in the context of the surrounding area. Given the location, proximity to the State Highway network, and high demand for business land in this location, we consider that it is best suited to Business – Light Industry use.

6.3 Proposed Plan Change 5

Proposed Plan Change 5 ('PC5') was publicly notified by Auckland Council on 21 September 2017. It sought to rezone 351 ha of land in the southern and eastern parts of Whenuapai from FUZ to a mix of residential and business zones. The PC5 area and the existing zoning is shown below:

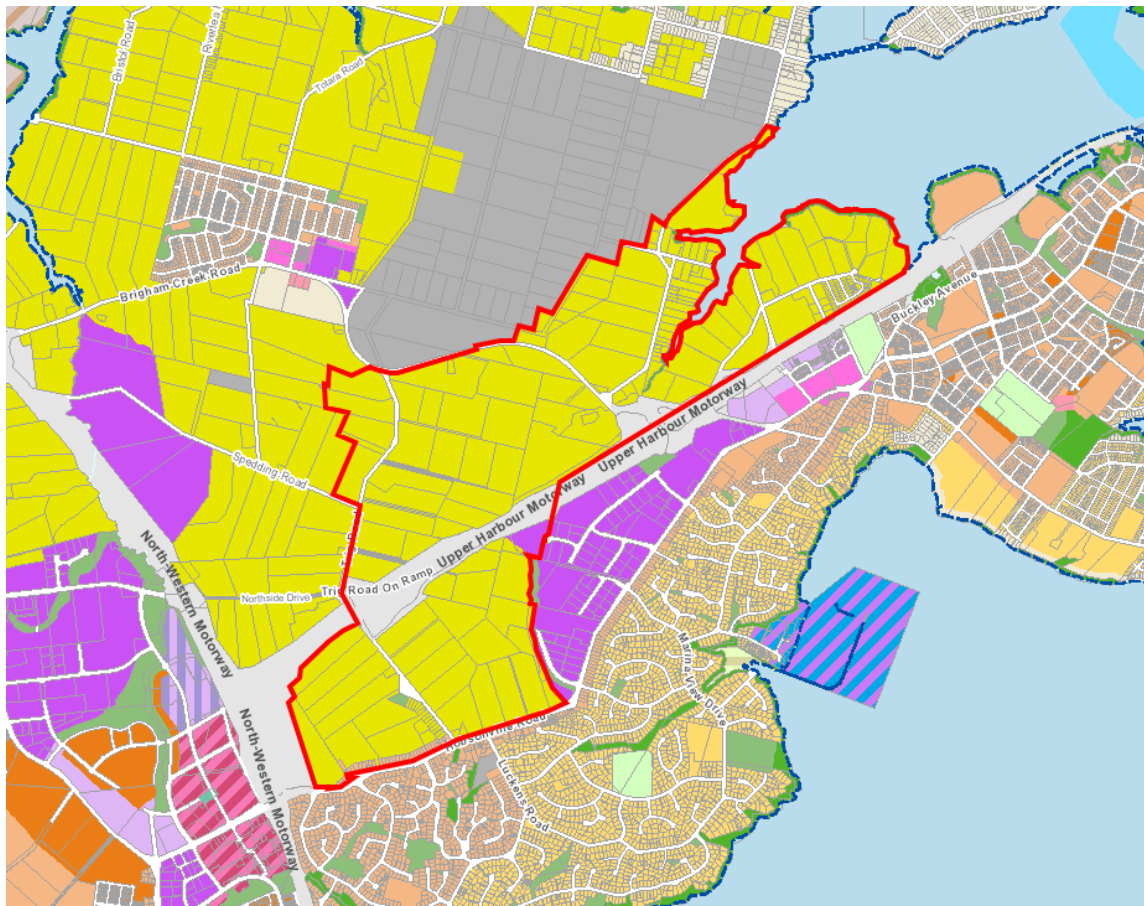


Figure 19 - PC5 area shown within red line

PC5 was withdrawn by Auckland Council on 16 June 2022, nearly five years after it was publicly notified. The PC5 timeline is outlined below:

- Notified on 21 September 2017
- Submission period closed on 19 October 2017
- Summary of Decisions requested notified on 9 November 2017
- Further submissions closed on 23 November 2017
- Hearings commenced May 2018, hearings reconvened and adjourned August 2018
- The Council's Planning Committee approved the development of a Variation on 5 February 2019
- In March 2021, the Independent Hearing Panel set a timeline for notification for May 2021

- PC5 was then withdrawn on 16 June 2022 for the following reasons:
 - i. *there is no funding budgeted in the lifetime of the Auckland Unitary Plan (ten years) for the upgrading of the wider transport networks to address the anticipated adverse effects from increased traffic generated by the development of land in Proposed Plan Change 5*
 - ii. *progressing Proposed Plan Change 5 (and any variation) through to a decision by independent hearing commissioners will not provide sound resource management outcomes in terms of managing adverse effects on the wider transport network*
 - iii. *progressing Plan Change 5 will not result in the rezoning of land within the Rural Urban Boundary that is integrated with the provision of infrastructure*
 - iv. *progressing Plan Change 5 creates a risk of the council having to provide infrastructure that is currently unfunded, or having to divert funding from other locations for which funding is required and exists*

Prior to the withdrawal of PC5, Auckland Council sought feedback on a draft variation to PC5 (Variation 1). The variation amended the indicative roading shown on the PPC land and reduced the extent of engine testing noise contours that affect the land.

With regard to the PPC land, PC5 proposed rezoning from FUZ to LIZ. Under PC5 (draft Variation 1), this was amended to a combination of predominantly LIZ, but also included the Residential – Single House zone along the north-east portion of the PPC area; as shown by the below figure.

The change of zoning along the north-eastern portion of the PPC land was at the request of the applicant and, as touched upon previously in this report, the LIZ that is now proposed under this PPC is deemed a more appropriate land use when considering the surrounding environment and context of the area.

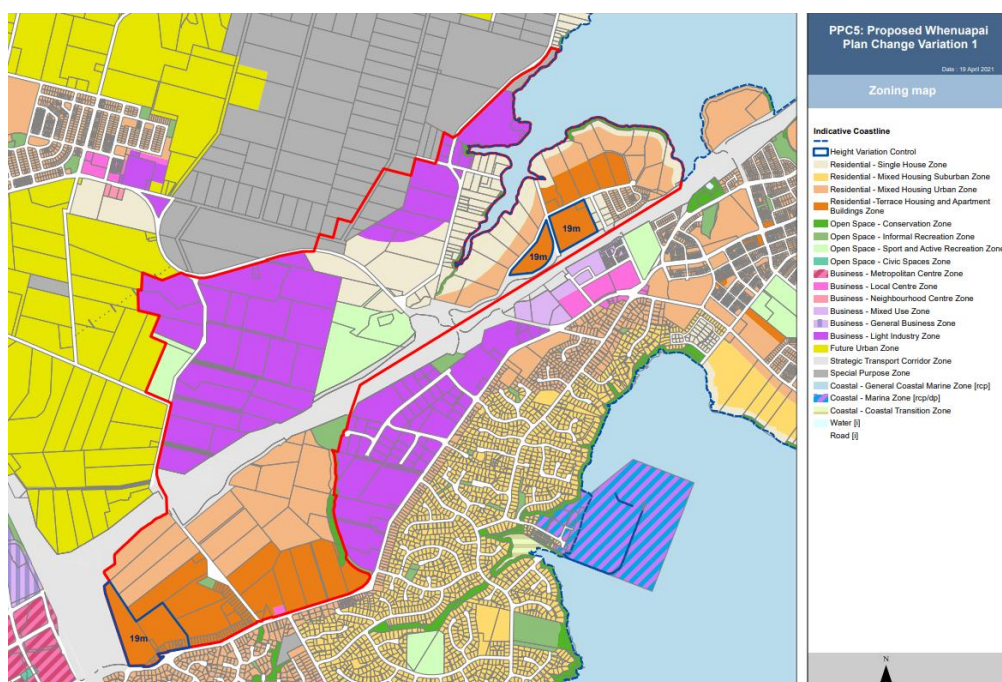


Figure 20 - PC5 draft Variation 1 proposed zoning

Whilst it is acknowledged that PC5 has now been withdrawn, the PPC has been designed to be generally aligned with the outcomes sought under PC5, and the subsequent variation. It is considered to be reflective of the development and outcomes that were sought by Auckland Council in regard to the PPC land.

6.4 Fast Track Consent Application

Resource consent for the Whenuapai Business Park was sought under the Covid-19 Recovery (Fast-track Consenting) Act 2020. An application to the Ministry for the Environment for referral to use the process was made in October 2021. The request for referral was subsequently approved by the Minister for the Environment and a resource consent application was then lodged in November 2022 to the Environmental Protection Agency ('EPA').

The application was subsequently declined by the Whenuapai Business Park Expert Consenting Panel in part because the proposal was considered to be inconsistent with the objectives and policies of the FUZ and not appropriate to occur without the rezoning of the land occurring first. This finding underpins the PPC, which is now sought to enable the development of the land for the envisaged light industry purposes.

6.5 Notice of Requirements

A range of Notice of Requirements ('NoR') have been lodged by Te Tupu Ngatāhi Supporting Growth ('SGA') for the north-west region to designate land for future transport infrastructure.

With regard to the PPC, NoR W1 (Trig Road) and NoR W3 (Brigham Creek Road) are the most relevant.

NoR W1 involves the widening and upgrading of Trig Road to 24 m in width with a single traffic lane in each direction, as well as separated footpaths and cycleways. NoR W3 involves the widening and upgrading of Brigham Creek to 30 m in width to accommodate four traffic lanes (two in each direction) and separated active modes on both sides of the road.

To briefly summarise how the proposed NoRs have been incorporated into the PPC, the upgrades proposed to Trig Road are consistent with the roading proposed under NoR W1. Due to existing constraints along Brigham Creek Road, the road upgrades proposed under the PPC differ from what is proposed under NoR W1. Further details on the proposed upgrades are provided in the Integrated Transport Assessment (**Appendix D**) and throughout this report.

7.0 Land Supply Documents

7.1 Future Urban Land Supply Strategy

The Future Urban Land Supply Strategy ('FULSS') was adopted by Auckland Council in July 2017 to determine the sequencing and timing of bulk infrastructure, as well the urbanisation of future urban areas. Under the FULSS, the PPC land is located within the Whenuapai Stage 1 area and identified as development ready in the first half of decade one (2018-2022). This timing is shown in the below figure.

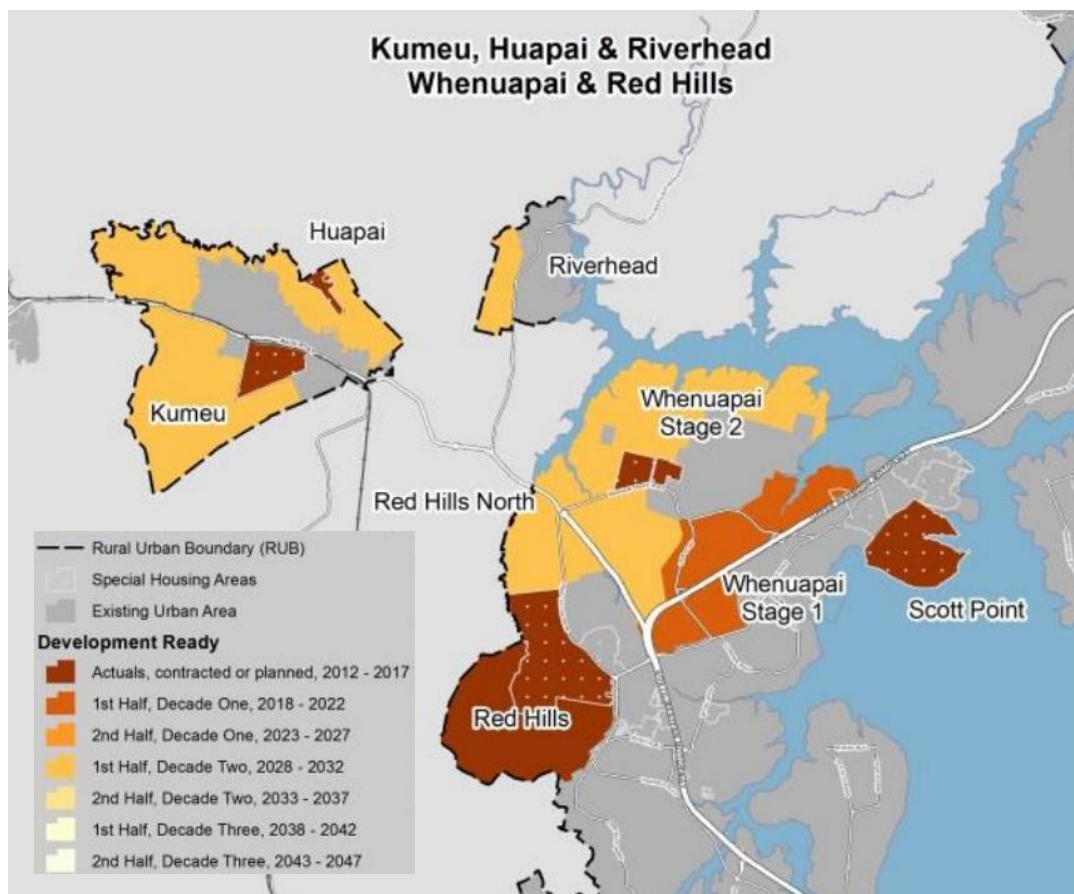


Figure 21 - FULSS sequencing of Whenuapai area

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

7.2 Future Development Strategy

The National Policy Statement on Urban Development ('NPS-UD') requires Auckland Council to develop a Future Development Strategy ('FDS') to manage growth in Auckland for the next 30

years. The FDS was approved for adoption on 2 November 2023 and replaces the FULSS and the 2018 development strategy contained within the Auckland Plan 2050.

Under the FDS, the PPC land is located within the Whenuapai Business area and is identified as being lived-zoned not before 2025 (refer **Figure 22** below). The PPC land was originally proposed as being development ready from 2035+ under the draft FDS although, after public feedback, this was amended to 2025+ as no significant challenges were identified that would otherwise make the development of the FUZ Whenuapai Business land inappropriate.

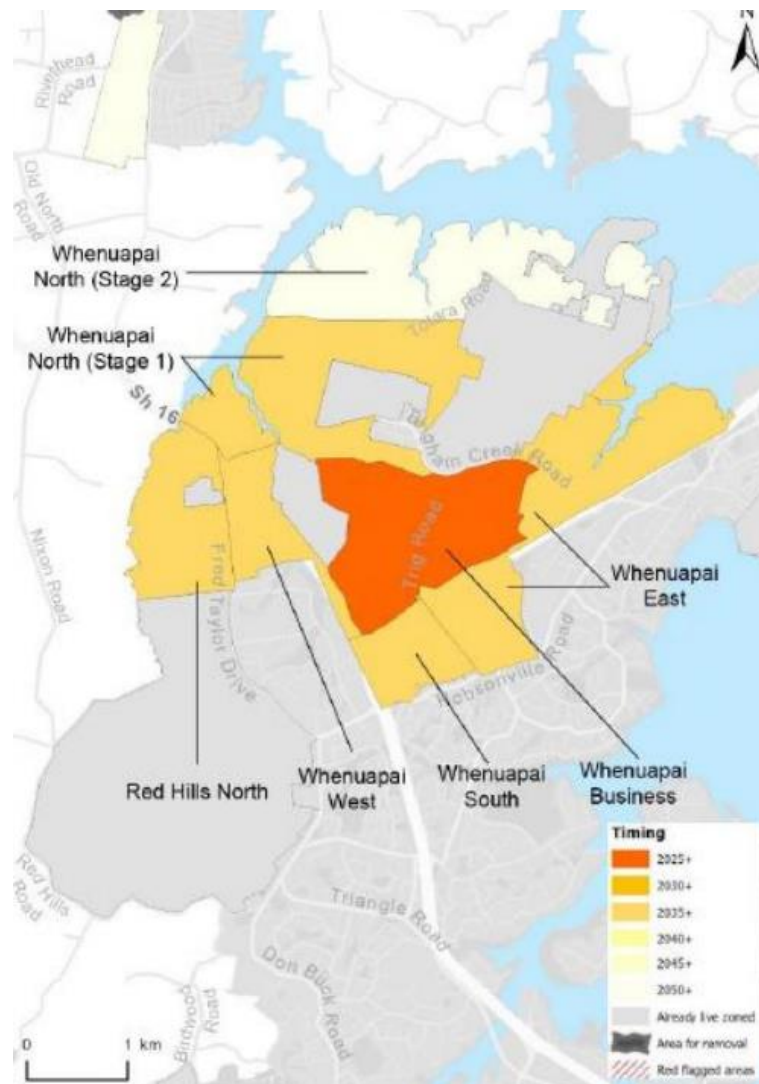


Figure 22 - FDS sequencing of Whenuapai area

8.0 Private Plan Change Request

8.1 Introduction

The applicant makes this request to Auckland Council, seeking a plan change to the Auckland Unitary Plan Operative in Part.

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

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

8.2 The vision for the PPC land

Neil Construction Limited has had a presence in Whenuapai for a number of years and has multiple land holdings across the Whenuapai area. The PPC land has been earmarked for industrial purposes for a considerable period of time and that history has now culminated in this PPC to realise the vision of the PPC land.

Neil Construction Limited has formed a project master planning team that has undertaken a comprehensive review of the PPC land, which builds off the work previously undertaken and confirms the appropriateness of the PPC. The core project team includes Cato Bolam – engineering; Viridis – ecology; Ian Munro – urban design; Sola - landscape architecture; Team Consultants - transportation; Campbell Brown Planning – planning assessment; Clough & Associates – archaeology; CMW Sciences – geotechnical; Insight Economics – economic assessment; Marshall Day Acoustics – acoustic assessment; and Geosciences – contamination.

The PPC is a result of extensive work by the project team, in combination with consultation and collaboration with Auckland Council, Auckland Transport, Healthy Waters, Te Tupu Ngatāhi Supporting Growth and Mana Whenua. It is considered that the PPC as proposed achieves the envisaged use of the PPC land for business and industrial activities, while still safeguarding the key features and attributes on both the PPC land and surrounding area.

With clear demand for industrial land in Auckland, particularly land suitable for land extensive activities, the PPC will enable development of land that would otherwise remain in a state of rural-urban limbo.

To achieve the Whenuapai Business Park vision, a Precinct plan and accompanying provisions have been developed to ensure future development is integrated with the wider aspirations of the Whenuapai area and greater north-west region of Auckland. Key drivers of the Precinct plan and provisions were the delivery of infrastructure, protection of ecological features and the identification of surrounding existing activities whose operations need to be safeguarded against future development.

8.3 Requirements of the Act

Part 2 of Schedule 1 of the Resource Management Act 1991 ('RMA') sets out the procedure to be followed when making a request to change a plan. Key elements of the process, in the context of this proposal, are noted below:

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

An important part of the plan change process is the s32 RMA requirement to undertake an evaluation of the costs and benefits of alternatives. The most relevant parts of s32 in terms of process are set out in clauses (1)-(3), which state as follows:

32 Requirements for preparing and publishing evaluation reports

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

¹ Clause 21(1), Schedule 1, RMA

² Clause 22(1), Schedule 1, RMA

³ Clause 22(1), Schedule 1, RMA

⁴ Clause 22(1), Schedule 1, RMA

⁵ Clause 22(2), Schedule 1, RMA

⁶ Clause 23, Schedule 1, RMA

⁷ Clause 25, Schedule 1, RMA

⁸ Clause 29(4), Schedule 1, RMA

- (a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
 - (b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) *summarising the reasons for deciding on the provisions; and*
 - (c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
- (2) *An assessment under subsection (1)(b)(ii) must—*
- (a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - (i) *economic growth that are anticipated to be provided or reduced; and*
 - (ii) *employment that are anticipated to be provided or reduced; and*
 - (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
- (3) *If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—*
- (a) *the provisions and objectives of the amending proposal; and*
 - (b) *the objectives of the existing proposal to the extent that those objectives—*
 - (i) *are relevant to the objectives of the amending proposal; and*
 - (ii) *would remain if the amending proposal were to take effect.*

The PPC seeks to rezone the land from FUZ to LIZ to enable the development of the land for industrial purposes, and to establish a Precinct across the PPC land and impose a Stormwater Management Area Flow (**'SMAF'**) control.

To a large extent, the PPC seeks to enable the envisaged use of the PPC land whilst still protecting its key features and acknowledging the existing uses within the surrounding area. The PPC has incorporated provisions that enable development to occur without significant adverse effects on to the amenity and function of the surrounding area.

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

In this context, the ‘*proposal*’ means the nature of the change, being to rezone the land in question from FUZ to LIZ, and to apply the Whenuapai Business Park Precinct and SMAF control across the PPC land, which includes a range of site-specific provisions for future development. The ‘*objectives*’ of the proposal refers to the objectives of the Precinct, which seek to enable development of a range of industrial activities on the land, require integration of suitable infrastructure, and ensure mitigation of potential effects. The ‘*provisions*’ refer to the introduction of the proposed Whenuapai Business Park Precinct provisions i.e., new Precinct plans and site-specific provisions, including new policies, activities, standards, rules, and assessment criteria.

Based on this explanation of the PPC proposal and its objectives, the s32 analysis requires the following assessment:

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

The s32 evaluation relating to the PPC is contained in section 9.0 of this report.

8.4 Nature and Purpose of the PPC

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

- Explain the purpose and reasons for the plan change request;
- Contain an evaluation report prepared in accordance with section 32 of the RMA; and

- The request shall describe any adverse environmental effects, taking into account Clauses 6 and 7 of Schedule 4, in a manner that corresponds to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the proposed change.

The PPC seeks the rezoning of the PPC land from FUZ to LIZ and the establishment of a new Precinct that includes a number of site-specific objectives, policies, activities, standards, and assessment criteria. The proposed zoning is shown in **Figure 23** below and provided in **Appendix E**.

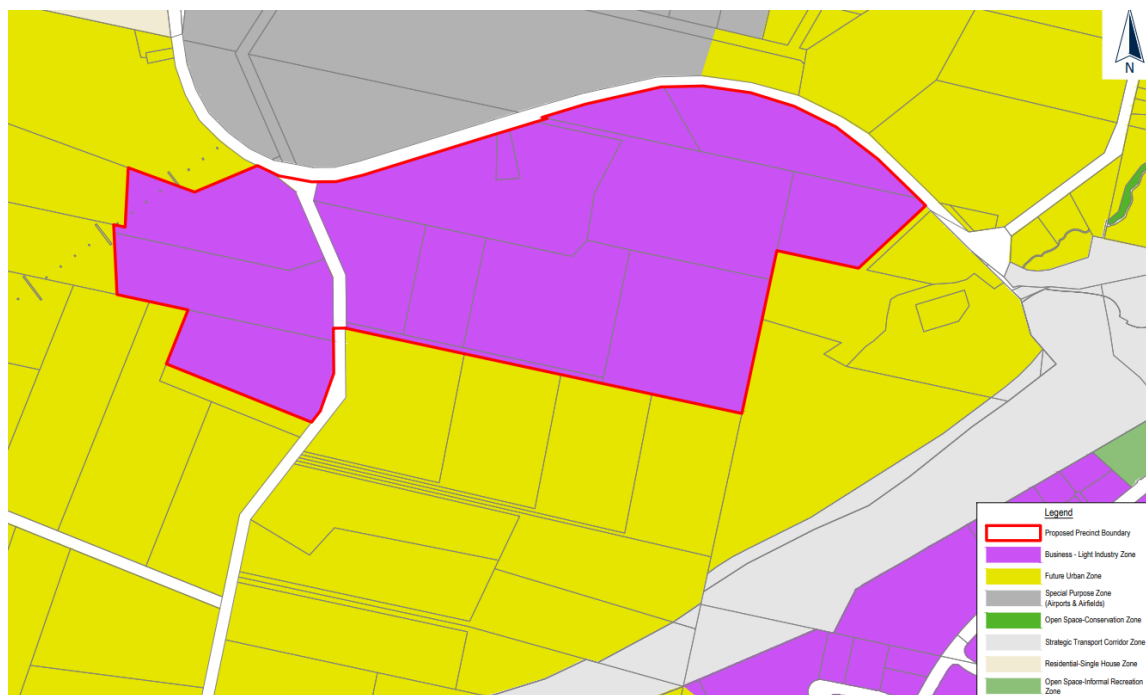


Figure 23 - Proposed zoning

The following outlines the key aspects provided for by the PPC:

Transport

- New internal road network
- Proposed signalised intersection off Brigham Creek Road
- Proposed left-in-left-out intersection off Brigham Creek Road
- Upgrade Brigham Creek/Trig Road intersection with a roundabout
- Proposed roundabout off Trig Road
- Upgrade of Trig Road along the PPC land frontage
- Upgrade of Brigham Creek Road along the PPC land frontage

Infrastructure

- Stormwater Management Plan

- Provision for new wastewater pump station
- Provision for upgrading of constraints in the potable water supply

Ecology

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

It is proposed that the entirety of the PPC land will be subject to a new Precinct, referred to as the Whenuapai Business Park Precinct, which includes a Precinct Plan, Infrastructure Staging Plan, and specific precinct provisions to effectively manage and control future development on the PPC land. The proposed Precinct Provisions are provided in **Appendix F** and the Precinct Plan is provided in **Appendix G**. These were developed to consider key features such as:

- Surrounding roading and infrastructure upgrades
- Indicative internal roading network
- Pedestrian/cycle linkages
- Retention and enhancement of existing wetlands and watercourses
- Protection of existing and future uses proposed within the surrounding area

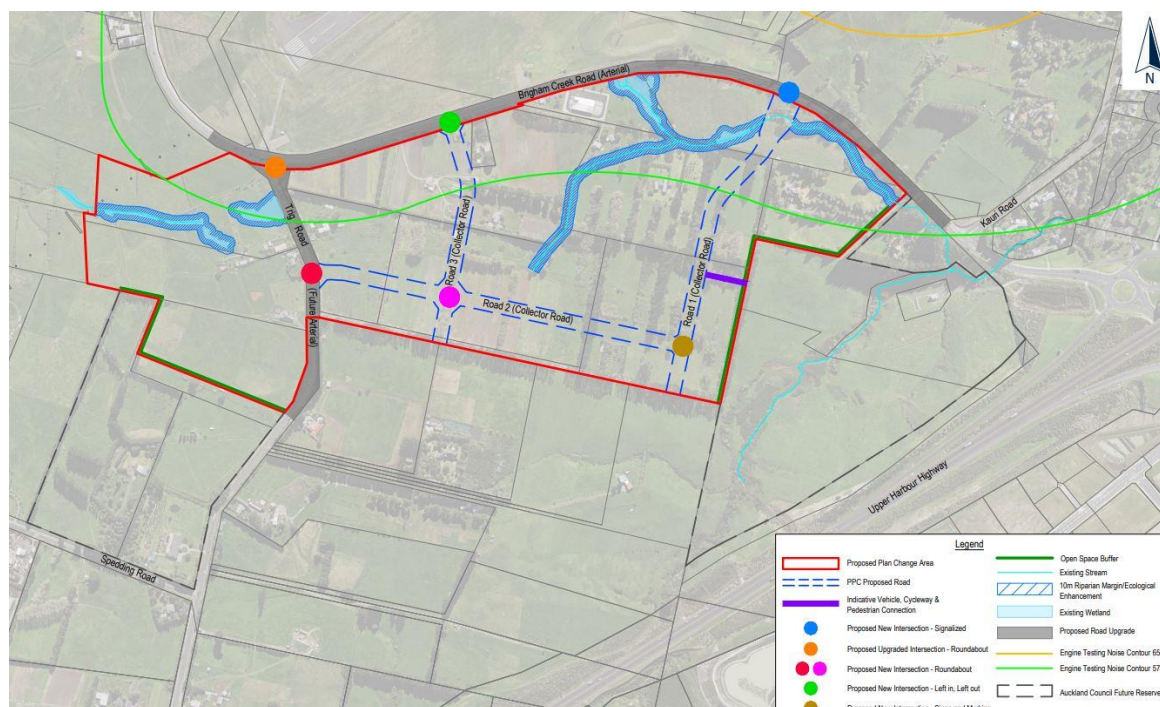


Figure 24 - Proposed Precinct Plan

The proposed staging plan is provided in **Appendix H** and outlines the provision of infrastructure required to enable the future development of the PPC land, as shown below:

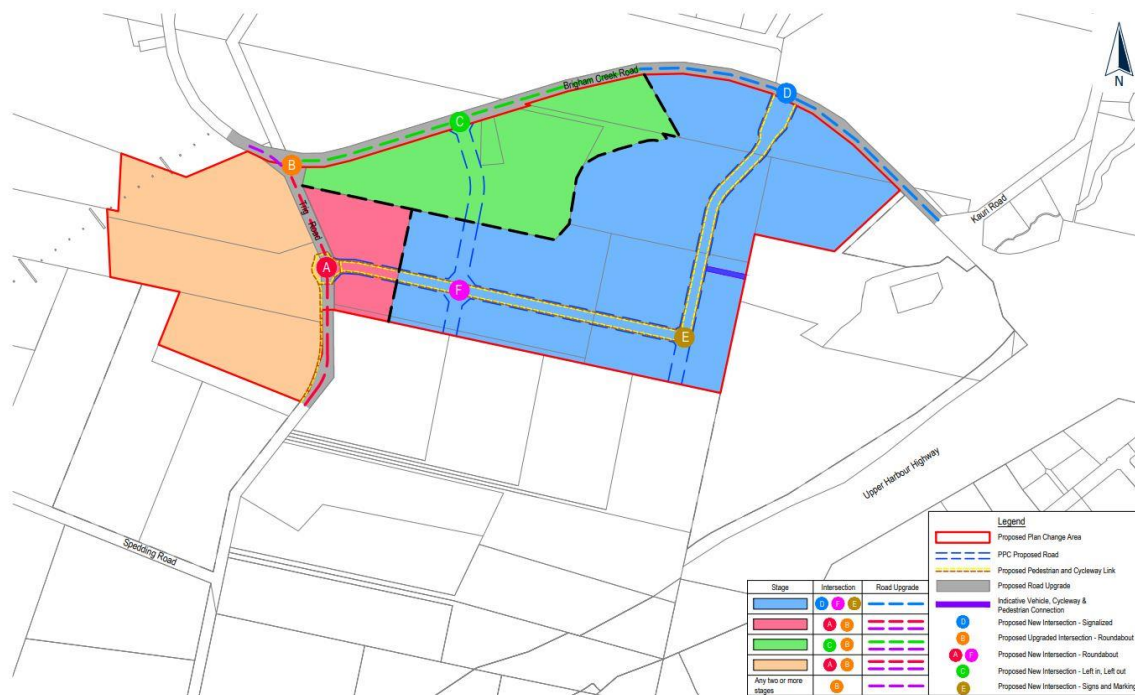


Figure 25 - Proposed Infrastructure Staging Plan

8.5 PPC Conclusion

Based on the evaluation contained in Section 9.0 of this report, it is considered that the PPC is the most appropriate means to achieve the purpose of the RMA. It would be the best available option to enable and facilitate the use of the land for the envisaged industrial uses, while protecting the environment and the operation of established or future activities in the surrounding area.

9.0 Section 32 Evaluation

9.1 Scope and Purpose

This s32 evaluation report is prepared to fulfil the statutory requirements of s32 RMA in respect of the PPC.

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

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

In accordance with s32(6) RMA and for the purposes of this report:

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

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

This s32 evaluation will continue to be refined in relation to any consultation that occurs, and in relation to any new information or changes that may arise, including through submissions and during the hearing. This approach of further evaluation is anticipated under the requirements of s32AA RMA.

We consider that s32(3) and (4) are not relevant as this proposal is for a new plan change, as opposed to amending an existing statutory document. As per s32(4a), a summary of the consultation undertaken for the PPC is provided in Section 11.4 and 12 of this report and responses to the received advice are provided throughout the report.

9.2 Evaluation of the Objectives

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

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

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

The objectives of the PPC are as follows:

General

- (1) Whenuapai Business Park Precinct is developed in a staged, comprehensive, and integrated manner to facilitate the development of a business area for predominantly light industrial land use activities.

Transport Infrastructure

- (2) Transport infrastructure that is required to service development with the Precinct:
 - a) Provides for freight
 - b) Provides safe and efficient walking and cycling connections
 - c) Provides for bus access and bus stops to support future improvements to public transport connectivity
 - d) Mitigates traffic impacts on the surrounding road network
 - e) Provides connectivity to facilitate future subdivision and development of adjacent sites; and

⁹ RMA, s5(1)

¹⁰ RMA, s5(2)

- f) Is staged and co-ordinated with subdivision and development
- (3) Roading connections, new or upgraded intersections, and the upgrading of Brigham Creek and Trig Road are provided to support subdivision and development within the Precinct.

Ecology

- (4) Ecological values including the health and well-being of streams and wetlands within the Precinct are enhanced.
- (5) Riparian, open space buffer, front yard and boundary planting contributes to increasing the canopy cover and indigenous biodiversity within the Precinct.

Three Waters Infrastructure

- (6) All necessary three waters infrastructure (being water supply, wastewater, and stormwater infrastructure) is in place to service development within the Precinct and is staged and coordinated with subdivision and development.
- (7) Stormwater quality and quantity is managed to maintain the health, well-being, and preserve the mauri, of the receiving environment, and minimise flood risk.
- (8) Stormwater devices avoid, as far as practicable, or otherwise minimise or mitigate adverse effects on the receiving environment, and the attraction of birds that could become a hazard to aircraft operations at RNZAF Base Auckland.

Effects on the Royal New Zealand Air Force Base (RNZAF) Base Auckland

- (9) The effects of subdivision, use and development on the operation and activities of RNZAF Base Auckland are avoided as far as practicable, or otherwise remedied or mitigated.
- (10) The adverse effects of aircraft engine testing noise on activities sensitive to aircraft noise are avoided, remedied, or mitigated at the receiving environment.

The objectives seek a range of outcomes, including integrated development of the PPC land for light industrial purposes, provision of appropriate transport infrastructure to support the development, protected and enhanced streams, natural wetlands, and downstream environments, and protected and unconstrained nationally and regionally significant infrastructure.

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

- The objectives seek that the PPC land be used for industrial purposes. There is a significant market shortfall of industrial land in Auckland, particularly in the north-west of the region, and provision of more industrial land in this location will enable people and the community to provide for their economic wellbeing.
- The objectives seek that the PPC land be served with appropriate and integrated transport infrastructure. This will facilitate active modes and public transport, with commensurate environmental benefits in terms of mitigation of climate change effects on future generations. In addition, provision of required urban transport infrastructure as an integrated element of development of the PPC land will avoid a significant future economic burden falling on the wider community as transport infrastructure is required to be upgraded.
- The objectives seek protected and enhanced streams, wetlands, and the downstream catchment, with benefits arising in terms of improved water quality, enhanced biodiversity, and mitigation of natural hazards. These outcomes contribute to sustaining natural resources, safeguarding the life-supporting capacity of water and ecosystems, providing for cultural wellbeing, and mitigating adverse effects on the environment.
- The objectives seek to ensure that nationally and regionally significant infrastructure is protected, with reference to RNZAF Base Auckland, the Spark internet cable landing station, and current and future arterial roads (as identified in the Supporting Growth Notices of Requirement). These outcomes protect physical resources that enable the community to provide for their social, economic, and cultural wellbeing, and health and safety.

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

9.3 Development of Options

In addition to consideration of the extent to which the objectives of the PPC are the most appropriate way to achieve the purpose of the RMA, s32 requires an examination of whether the provisions in the PPC the most appropriate way are to achieve its objectives by identifying other reasonably practical options for achieving the objectives. In the preparation of the PPC, the following options have been identified:

- **Option 1** – do nothing/retain the status quo
- **Option 2** – re-identify as LIZ

- **Option 3** – re-identify as LIZ, with a Precinct and SMAF control
- **Option 4** – same provisions as option 3, but applied to a smaller or larger area of land

The selected options do not represent an exhaustive list, as there is little value in identifying unrealistic options simply to knock them out. In particular, there is no identified residential option because residential use of the PPC land is not supported by the FDS.

It is acknowledged that the WSP identifies residential land use over most of the site at 159 Brigham Creek Road together with a small area of the eastern part 155-157 Brigham Creek Road (refer **Figure 26** below). However, any merit in that outcome has been overtaken by events since the WSP was prepared, because the surrounding land to the east of 159 Brigham Creek Road has now been acquired by Council for future recreation reserve. In those circumstances, residential use of 159 Brigham Creek Road would become isolated from other residential areas. This results in a situation where there is no longer any credible case for using this land for residential purposes since the adjoining land was acquired for a reserve.

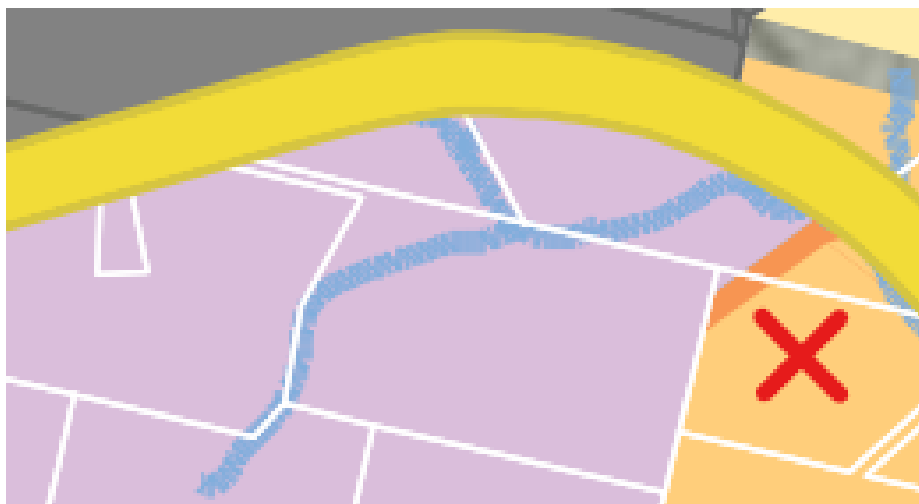


Figure 26 - Residential land use shown on 159 Brigham Creek Road (red X)

9.4 Evaluation of Options

In accordance with s32(1)(b) and 32(2) of the RMA, the options have been assessed on their efficiency, effectiveness, costs, benefits, and risks. Within this evaluation, the following meanings have been assigned to the evaluative criteria:

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

- **Benefits** are positive effects that arise.
- **Risk** is considered in the context of costs and benefits and is the prospect of unanticipated costs arising or potential benefits failing to materialise.¹¹

The results of this s32 evaluation are discussed in this section. There are no realistic non-regulatory methods that could deliver the outcome sought by the PPC.

In considering the efficiency and effectiveness of the provisions, it should be noted that reliance has been placed on existing AUP rules and standards where those would play a role in achieving the objectives. New Precinct provisions are not proposed where those would simply duplicate existing operative provisions of the AUP. Existing rules, standards, or other regulations that have been relied on to support the conclusions in this s32 evaluation include:

- Stormwater Management (Chapter E1)
- Stream works (Chapter E3)
- Earthworks (Chapter E11/12)
- Vegetation management (E15)
- Vehicle Access Restrictions applying to arterial roads (Chapter E27)
- Flooding management (Chapter E36)
- Subdivision (E38)
- Riparian yard standards (Chapter H17)
- Aircraft Noise Overlay (Chapter D24)
- Ministry of Defence Designations 4310 and 4311

These existing AUP provisions are effective and efficient in achieving the objectives of the proposal, and consequently do not need to be replaced or amended. As they are existing, there are no significant costs incurred through retaining them and they give rise to benefits relating to stream health, traffic safety, and managing potential reverse sensitivity effects.

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

The ‘do nothing’ option would mean that the zoning of the land would remain unchanged, such that the PPC land would be retained as FUZ.

This option does not foreclose urban development but at best defers it to an undetermined future date. The PPC land is likely to largely remain in its current (somewhat neglected and unproductive) state until that time.

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

Option 1 is not **effective** in achieving the objectives because nothing will change. It does not enable industrial development nor to provide for the suite of environmental enhancement and mitigation outcomes that is sought by the objectives.

Option 1 cannot be an **efficient** way of achieving the objectives if it does not achieve them at all. Retaining the PPC land as FUZ extends the duration of its current transitional and neglected state, with minimal productive use for rural purposes and without appreciable private investment because of the prospect of urbanisation. In a broader sense, Option 1 does not enable an efficient use of land that is largely unencumbered by constraints, is relatively flat and easy to develop, and is well-located with regard to transport options. It also fails to efficiently utilise the significant public investment in infrastructure that has occurred in Whenuapai, comprising bulk wastewater and water services, and purchase of land for public open space.

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

Failure to address the current undersupply of employment opportunities in the north-west of Auckland gives rise to opportunity costs. There would be no reduction in average distances travelled to work, whereas that would be an outcome if the PPC land were rezoned for industrial purposes. This imposes an environmental cost because greenhouse gas emissions associated with commuting would not be abated, and a social cost as longer journeys to work mean workers spend more time away from their families.

There is also an economic cost in foregoing the boost to the economy that would arise through construction, and through the creation of more permanent local jobs. Some of these opportunity costs have been quantified through the economic assessment that supports the PPC. That assessment estimates that the PPC could generate full time employment for 1,110 people, provide over \$77.5 million in salaries/wages, and generate an overall annual output of more than \$395 million to support not only the north-west but the wider Auckland region. If the PPC does not proceed, these are effectively costs to the local economy through unrealised potential benefits.

The shortage of industrial land in this location is acknowledged in the FDS, which states:

“Business land is identified in future urban areas. This includes areas where there had been past shortages, such as in the North-west at Whenuapai, and in the North at Silverdale. Development of business land in future urban areas will help address local and sub-regional employment inequities and contribute to emissions reduction.”¹²

¹² FDS, p53

Retention of the streams and natural wetlands in their current degraded condition imposes an environmental opportunity cost, because the PPC proposes to enhance these features through weed removal and replanting with appropriate indigenous species.

There are no obvious **benefits** associated with Option 1. The PPC land is not used for any significant level of primary production, so retention of the land in a semi-rural state will have no appreciable benefit in terms of food production. Maintaining the status quo enables a small number of existing houses on the PPC land to be retained and used for residential accommodation, which is a minor benefit of Option 1.

Overall, Option 1 would give rise to several costs and deliver no significant benefits. It would not achieve the proposed objectives.

Option 2 – re-identify as Business – Light Industry Zone

This option would change the zoning of the land from FUZ to LIZ and, in so doing, provide for approximately 36 ha of developable land to be urbanised for industrial purposes.

Option 2 is **effective** in part, because it enables the land to be urbanised and developed for industrial purposes in accordance with existing rules in the AUP. That is a key objective of the PPC that can be achieved by this option.

However, it *may not* be effective in achieving some of the objectives. For example, those objectives that seek infrastructure upgrading and enhancement of streams and natural wetlands may not be fully achieved because there are no existing provisions of the AUP that directly require those outcomes in relation to the PPC land. It is likely that there would be discussions and negotiations in relation to the achievement of those objectives when resource consent applications are sought. Similarly, Option 2 *will not* be effective in achieving other objectives, such as those seeking mitigation of reverse sensitivity effects to protect the operation of RNZAF Base Auckland and the future reserves that adjoin the PPC land. In the absence of new PPC provisions seeking to prevent sensitive activities locating within engine testing noise contours, there is no policy or rule framework in the AUP that can achieve that outcome. Similarly, rezoning alone would not provide any mechanism for attaining boundary treatment at the interface with the two adjoining future reserves (or provide enhanced planting on street frontages).

Option 2 will provide for the PPC land to be used for industrial purposes in an **efficient** way, because it simply rezones the land. However, without any clear mechanism to achieve the other objectives of the PPC it is likely that any success in achieving those objectives would need to be negotiated through the processing of any resource consent applications and as such is anticipated to be inconsistent and haphazard. That does not provide an efficient means of achieving the full range of PPC objectives.

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

A financial cost on the wider community could potentially arise if transport infrastructure is not upgraded sufficiently to mitigate the effects of urbanising the PPC land. Any shortfall in the funding of infrastructure to meet the needs of the PPC area would need to be met by the community in the future through rates or other mechanisms. There would be opportunity costs on the environment because there would be no mechanism for the enhancement of streams and natural wetlands under Option 2. There is also greater potential for reverse sensitivity effects to arise in relation to the operation of RNZAF Base Auckland if activities that are sensitive to engine testing noise can establish on the PPC land (which would be the case under the current LIZ provisions in the AUP). Constraints on the efficient operation of RNZAF Base Auckland would effectively be a cost to the wider community, given that this strategic facility fulfils a regionally and nationally significant function.

Option 2 delivers economic and employment **benefits** in relation to the provision of scarce industrial land, and partly addresses a sub-regional imbalance in residential and employment land use that can reduce commuting trips. Arguably, it also has benefits for the landowner insofar as it reduces financial obligations that would otherwise arise to achieve some of the objectives (such as infrastructure upgrading), but these benefits come at an equivalent cost to the community or the environment.

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

Option 3 – re-identify as Business – Light Industry Zone with a precinct and SMAF control

This option would change the zoning of the land from FUZ to LIZ. Like the previous option, Option 3 provides for approximately 36 ha of developable land to be urbanised for industrial purposes. However, it also proposes a Precinct and SMAF control to manage effects that could not be effectively managed through the existing AUP provisions.

Option 3 is **effective** because it delivers more industrial land while also providing means to achieve the other objectives of the PPC. The range of rules and standards that would be introduced through the Precinct and SMAF control will enable each of the objectives to be appropriately addressed.

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

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

Option 3 does generate a broad range of **benefits**. The economic assessment estimates that the PPC could generate full time employment for 1,110 people, provide over \$77.5 million in salaries/wages, and generate an overall annual output of more than \$395 million to support not only the north-west but the wider Auckland region (acknowledging that these benefits also arise with Option 2). In addition to providing additional industrial land where a significant and acknowledged shortfall exists, Option 3 facilitates the funding and establishment of required infrastructure and provides for the enhancement of streams and natural wetlands within the PPC land. It also manages reverse sensitivity effects on RNZAF Base Auckland and ensures an appropriate interface between the PPC land and adjoining future parks.

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

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

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

Any rezoning to LIZ in Whenuapai would contribute towards addressing the shortfall of industrial land in this part of Auckland. Obviously, a greater area of rezoned land would make a larger contribution and a smaller area would make a correspondingly lesser impact. The spatial extent of the PPC land does not significantly alter the **effectiveness** of the PPC in achieving its objective of providing for more industrial land, other than acknowledging that more land is evidently better.

The PPC will be **efficient** in its ability to achieve the objectives, irrespective of the area of land that will be rezoned, because the proposal includes both a rezoning and the introduction of a

Precinct and SMAF control. The PPC applies to all the land within its boundary, which is more efficient than a PPC area that excludes individual lots within a wider area of rezoning. Exclusion of small parcels of land would necessitate the introduction of additional plan changes in the future to deal with isolated sites, which is an inefficient way of transitioning from FUZ to an appropriate urban zone. Examples of such smaller landholdings include 145 Brigham Creek Road and 159 Brigham Creek Road, both of which contain existing dwellings. Continued residential use could give rise to reverse sensitivity effects were these dwellings to remain amongst future industrial uses.

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

The **benefits** of a smaller or larger PPC area need to be considered in the context of the specific location of boundaries and the nature of the surrounding environment. The PPC boundaries have been selected to achieve a cohesive and logical area for industrial rezoning.

At the eastern end of the PPC area, the boundary is largely defined by a future park on land owned by Auckland Council. That land will have a different zoning in the fullness of time to that now proposed for the PPC area, so forms a logical boundary. The western extent of the PPC has been selected to enable both sides of Trig Road to be rezoned, as this will facilitate upgrading of both sides of the road to an appropriate urban standard and formation of new road intersections. The southern boundary of the PPC area has been determined because it generally aligns with the northern boundary of another future area of recreation reserve, and because it maintains most of the PPC area within a sub-catchment that drains to the watercourse in the northern part of the PPC land. Brigham Creek Road forms the northern boundary of the PPC area, and that is an appropriate demarcation given its existing arterial road status. That is also a boundary that is established through the FDS for the area that is enabled to be live zoned from 2025 for industrial purposes.

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

9.5 Risk of Acting or Not Acting

Section 32(2)(c) RMA requires this evaluation to assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. It is considered that there is sufficient information about the proposed rezoning to LIZ (with a Precinct and SMAF control) to proceed with the PPC. The change from FUZ to LIZ, and the introduction of a new Precinct and SMAF control, is neither unclear or uncertain. This s32 evaluation will continue to

be refined in relation to any new information that may arise following notification, including during hearings.

9.6 Overall Conclusions of s32 Evaluation

The evaluation of options undertaken in this report demonstrates that the preferred option for meeting the objectives of the PPC is a plan change to the AUP to rezone the PPC land to LIZ and apply a Precinct and SMAF control to manage future development (referred to in this s32 evaluation as Option 3).

The proposed reidentification to LIZ is consistent with, and gives effect to, the direction established by the WSP and the FDS. In accordance with s32(1)(a), the objectives in the PPC Precinct are the most appropriate way to achieve the purpose of the RMA, and rezoning the land for industrial purposes (with a Precinct and SMAF control) is the most efficient and effective means of achieving the objectives of the proposal.

10.0 Resource Management Framework

10.1 Introduction

The strategic framework for the assessment of a proposed plan change comprises both RMA and non-RMA documents. While the primary document to be considered is the AUP, the Auckland Plan (given effect to by the AUP) and the National Policy Statement on Urban Development 2020 (which is also to be given effect by the AUP) are also relevant documents.

10.2 Part 2 of the RMA

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

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

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

Part 2 matters relevant to the PPC include:

- enabling people and communities to provide for their social, economic, and cultural well-being (s5(2));
- sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations (s5(2)(a));
- safeguarding the life-supporting capacity of air, water, soil, and ecosystems (s5(2)(b));
- avoiding, remedying, or mitigating any adverse effects of activities on the environment (s5(2)(c));

- the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development (s6(a));
- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga (s6(e));
- kaitiakitanga (s7(a));
- the efficient use and development of natural and physical resources (s7(b));
- the efficiency of the end use of energy (s7(ba));
- the maintenance and enhancement of amenity values (s7(c)); and
- the effects of climate change (s7(i)).

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

It is considered that the PPC will promote sustainable management as it encourages the integration of land use and transport infrastructure, whilst enabling industrial activities to occur that will contribute to the supply of industrial land needed to meet unsatisfied demand. The additional land will assist in addressing Auckland’s historic undersupply of land suited for industrial activities, particularly land extensive industrial activities, while avoiding or sufficiently mitigating adverse effects on to the environment.

Section 6 lists a number of “Matters of National Importance.” In respect of these matters, the proposal will contribute to the preservation of natural features (wetlands and streams) and increase native vegetation, and it will recognise the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga (s6(e)).

In terms of “Other Matters” listed in Section 7, it is considered that items (a), (b), (ba), (c) and (i) are of particular relevance to the PPC. The PPC enables the envisaged use of the PPC land to be realised and increases the potential for the land resource to be efficiently used for development. The provisions applying to the Whenuapai Business Park Precinct will ensure that appropriate activities are established and managed, protection of natural features, and encourages the use of public transport, and cycling and walking facilities via the transport links and provisions proposed. The proposed precinct provisions introduced with the PPC will ensure that the amenity values of the PPC land and the surrounding environment will be maintained. The proximity of the PPC land to residential areas will provide more opportunities for people to work close to where they live. This will have benefits through reducing commuting distances, thereby enabling more efficient energy use, and combating the effects of climate change.

In relation to Section 8, there are no known Treaty issues with the PPC land, although the role of Mana Whenua throughout the PPC process is acknowledged. The applicant is committed to an ongoing partnership with Mana Whenua who hold an interest in the area and will continue

to be in open dialogue for the entirety of the PPC process and beyond. Please refer to the consultation summary in **Appendix I** for details.

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

10.3 Other Relevant Sections of the RMA

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

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

“the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”.¹³

The PPC assists in fulfilling this function as it provide for additional industrial land to meet the high demands of the Auckland region for industrial land in strategic locations that is suitable for a range of business and industrial activities, particularly land extensive industrial activities.

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

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

It is also noted that a territorial authority must not have regard to trade competition or the effects of trade competition in preparing or changing its district plan (s74(3)).

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

¹³ Section 31(1)(aa) was inserted into the RMA in 2017

10.4 National Policy Statements

National Policy Statements (**'NPS'**) are instruments issued under s52(2) of the RMA and state objectives and policies for matters of national significance. There are currently eight national policy statements in place:

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

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

The NPS for Greenhouse Gas Emissions from Industrial Process Heat is considered to be potentially relevant to specific industrial activities, rather than the change in land use this application is seeking. Therefore, is not addressed further as part of this application.

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

The NPS-UD is designed to improve the responsiveness and competitiveness of land and development markets. In particular, it requires local authorities (of which Auckland is recognised as a 'Tier 1' authority) to provide sufficient development capacity, so more business land can be provided to meet the high demand. The NPS-UD provides direction to ensure capacity is provided in key, strategic locations, assisting in Auckland having access to business places that are close to transport links, housing, public transport, and other amenities.

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

The PPC accords with many of the objectives and policies of the NPS-UD, as it seeks to provide additional land supply for business growth, in an area close to a labour force, serviced by existing or planned public transport, and where there is high demand for business land. Particular objectives and policies that are relevant to the PPC are noted below:

- Objective 1:** *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*
- Objective 3:** *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
- (a) the area is in or near a centre zone or other area with many employment opportunities*
 - (b) the area is well-serviced by existing or planned public transport*
 - (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*
- Objective 4:** *New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*
- Objective 6:** *Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.*
- Objective 8:** *New Zealand’s urban environments:*
- a) support reductions in greenhouse gas emissions; and*
 - b) are resilient to the current and future effects of climate change.*
- Policy 1:** *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
-
- (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.*
- Policy 2:** *Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

- Policy 6:** *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*
- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
 - (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) are not, of themselves, an adverse effect*
 - (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*
 - (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
 - (e) the likely current and future effects of climate change.*

- Policy 8:** *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*
- (a) unanticipated by RMA planning documents;*
 - (b) or out-of-sequence with planned land release.*

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

- The proposed rezoning of the PPC land from FUZ to LIZ will enable the anticipated growth of Whenuapai and assists in achieving both the current and future demand for industrial land in north-west Auckland in a strategic location to both existing residential and industrial areas, as well as key transport connections.
- The PPC is located in an area of Auckland with a rapidly growing population. However, many residents are required to travel across Auckland for their employment, (as detailed in the Economic Assessment in **Appendix J** and elsewhere in this report) to areas such as Albany, Manukau, and Penrose. The PPC will enable the development of industrial land that is located within close-proximity to existing centres, existing and planned residential areas, and transport links, as well as existing and planned public transport that will enable greater opportunities for people to both live and work in the north-west.

- The PPC is a direct response to demand for industrial land in the north-west and provides for the changing demands of Auckland. In particular, it will provide potential for large lots that are suited to land extensive industrial activities, whilst also providing for a range of new funded infrastructure and upgrades to existing infrastructure via the proposed Precinct provisions that will assist in safeguarding and integrating the PPC land with future development of the surrounding area.
- The flat, large land area of the PPC land enables a range of industrial activities of varying sizes to be provided for, particularly land extensive industrial activities that are historically undersupplied. The strategic location of the PPC land ensures that the proposed industrial land is not isolated but rather seamlessly integrated with surrounding residential and industrial land uses through the vehicle, walking, cycling, and pedestrian connections proposed. In addition, the PPC provides for the future development of the PPC land in a resilient manner that protects ecological features, comprehensively manages stormwater generation, and ensures integration with public transport as a way of managing climate change effects.
- The PPC land's current Future Urban zoning anticipates that development and subsequent urbanisation will occur. The zoning proposed by the PPC is considered to be generally consistent with the WSP and the long-term vision for the PPC land, being industrial/business land uses. Whilst it is acknowledged that the amenity values of the PPC land will change considerably, a shift from a semi-rural environment has already occurred via the approved earthworks on the PPC land and the urbanisation of the surrounding area with a range of industrial and residential uses. In addition, the change in amenity is anticipated by a range of planning documents, such as the FDS.
- While it is acknowledged that not all infrastructure outlined under the WSP and FDS can be provided for by the PPC, the PPC is considered to be in sequence with development timing and provides for a range of new and upgrading of existing infrastructure to ensure the rezoning of the PPC land contributes to a well-functioning urban environment.

10.4.2 The National Policy Statement for Freshwater Management

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

10.4.3 The National Policy Statement for Indigenous Biodiversity

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

10.4.4 New Zealand Coastal Policy Statement

The PPC land is considered to be well removed from the coast, with only the unnamed tributary from the Waiarohia Stream, which flows out into the Waitemata Harbour, being located on the PPC land. However, for completeness we note that the New Zealand Coastal Policy Statement ('NZCPS') recognises the impact of inland activities on the coast and sets out a range of objectives and policies to protect New Zealand's coastal environment. It is considered that, due to the PPC land's location away from the coast, the natural character of the coastal environment will not be impacted. In addition, the PPC incorporates a range of provisions relating to stormwater management to ensure adverse stormwater effects on the existing stream network are appropriately managed and mitigated. Overall, the PPC is not considered to be contrary to the NZCPS.

10.5 National Environmental Standards

National Environment Standards ('NES') are regulations that prescribe standards for environmental matters. There are six NES in force as regulations, but none of these are relevant to the PPC. In respect to contamination, any contamination previously identified has already been remediated under existing approved resource consents. Land within the PPC area that may be contaminated (but has not yet been identified) will be remediated as future development occurs. On this basis, no further regard needs to be given to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health or matters of soil contamination relating to the PPC land.

10.6 National Planning Standards

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

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

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

10.7 The Auckland Plan (2018)

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

One of the key outcomes of the AP is to ensure Auckland is prosperous with many opportunities that create the conditions needed for a resilient economy through innovation, employment growth and raised productivity. The PPC will enable employment growth through the provision of in demand business land that will provide opportunities for a greater range of companies and businesses to establish in Auckland's north-west. In addition, the PPC will assist in retaining key businesses and companies in the Auckland region rather than relocation elsewhere in the country, resulting in continued investment and creation of jobs for both the wider Auckland region and at a local level for Whenuapai and the north-west area.

Another key outcome of the AP is providing sufficient transport and access for Aucklanders by better connecting people, places, goods, and services, whilst also increasing travel choice. The PPC is located in a strategic location within close proximity to multiple key transport links, such as State Highways 16 and 18, to support the efficient movement of goods and services across the Auckland region and beyond. A range of existing and planned public transport infrastructure projects within the surrounding area will further support and encourage alternative modes of travel. Furthermore, the PPC includes a range of new and the upgrading of existing transport infrastructure to support a more efficient transport network.

The AP also strives to protect and preserve the natural environment and encourages growth and development to protect and enhance Auckland's natural environment. The PPC protects existing ecological features, such as streams and wetlands, in addition to enhancing these areas through a range of native planting within both riparian areas and elsewhere on the PPC land.

Overall, it is considered that the PPC is consistent with the Auckland Plan 2050 as it will contribute to Auckland's prosperity and economic growth by providing a range of employment

opportunities in a strategic location with key transport links across the Auckland region. Furthermore, it provides for in-demand business land and includes key transport and infrastructure upgrades to meet demand.

10.8 Future Development Strategy 2023

As touched upon above, the FULSS contained within the Auckland Plan 2050 has now been replaced by the FDS. The FDS focuses on the long-term future of Auckland and how growth should be managed for the next 30 years to ensure sufficient residential and business land is provided. The Auckland Plan 2050 and the FDS work in tandem to set the high-level direction for Auckland over the long-term.

Under the FDS, the PPC land is located within ‘Whenuapai Business’ and is identified as being live zoned not before 2025+. This timing has been determined based on the reassessment of the Whenuapai Business area not identifying any significant challenges that would otherwise make development inappropriate. It is considered that the PPC is consistent with the timing proposed under the FDS as the land will be ready for development from 2025. In addition, as discussed in further detail in Section 10.9 below, the PPC is considered to be consistent with the WSP.

Another key aspect of the FDS is the provision of infrastructure pre-requisites to support the development and growth of future urban areas. With regard to the Whenuapai Business area where the PPC is located, the below infrastructure prerequisites are applicable:

Whenuapai Business	<p>Not before 2025+</p> <p>* some business can take advantage of existing capacity, these are the projects required to support full build out.</p>	<p>Spedding Road/ Northside Drive connection over SH16 SH16 to SH18 Connections Spedding Road Upgrade and Extension Mamari Road Upgrade and Extension Trig Road Upgrade North Western Bus Improvements (not rapid transit) Northwest Rapid Transit Whenuapai Wastewater Package 1 Whenuapai Wastewater Package 2 Trig Road Water Reservoir, North Harbour No.2 Watermain Project</p>
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Figure 27 - Infrastructure pre-requisites for Whenuapai Business (FDS)

Particular note is given to the FDS enabling some development being able to take advantage of existing capacity and not requiring the support or full build out of the identified projects. Through extensive consultation and collaboration with Auckland Council, Auckland Transport

and SGA, the PPC includes a range of new and upgraded roading infrastructure to support future development, as outlined below:

- The upgrading of Trig Road along the PPC frontage to an urban standard that aligns with the roading proposed by SGA under NoR W1, which includes road widening, a single traffic lane in each direction, and separated footpaths and cycleways.
- The upgrading of Brigham Creek/Trig Road priority controlled intersection to a single lane roundabout (supported by Auckland Transport).
- The upgrading of Brigham Creek Road along the PPC frontage to an urban standard that includes a minimum of a single traffic lane in each direction, separated footpaths and cycleways on the southern side and the upgrade of the existing shared footpath/cycleway on the northern side.
- A new signalised intersection and a left-in-left-out intersection off Brigham Creek Road.
- A new roundabout intersection off Trig Road.
- Provision of land for future bus stops within the internal road network and on Trig Road.
- A new internal road network, which includes separated footpaths and cycleways, and pedestrian linkage to the future Council open space.

The proposed precinct staging plan will guarantee that the development of the PPC land does not occur until the relevant infrastructure has been provided, ensuring that development does not proceed prior to these upgrades occurring. The proposed roading upgrades have also considered the future of the surrounding area by being consistent with the SGA's roading cross sections or being a suitable interim design that is compatible with anticipated future upgrades.

Whilst it is acknowledged that the Northwest Rapid Transit project is currently at the community engagement stage and has not been completed, the PPC is considered to provide for future public transport growth through the provision of future bus stops within the internal road network and on Trig Road. In addition, the Western Express bus service opened in early November 2023 and provides frequent bus services directly to the CBD every ten to fifteen minutes. The local Whenuapai bus service, route 114, provides a direct link to the bus interchange for the Western Express.

On this basis, it is considered that due to the PPC land being identified as live zoned from 2025+ and acknowledging that some businesses can take advantage of existing capacity, the PPC is considered to be consistent with the FDS and provides for a range of new and upgrades of existing infrastructure to ensure the PPC is integrated with the existing and future environment.

10.9 The Whenuapai Structure Plan

As touched upon previously, the PPC is considered to be consistent with the Whenuapai Structure Plan (WSP), which anticipates business uses across the majority of the PPC land. To

expand on how the PPC has incorporated the outcomes of the WSP for the PPC land, further assessment has been undertaken. The vision for Whenuapai under the WSP is outlined below:

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

The PPC is considered to be consistent with the vision for Whenuapai as it will provide substantial employment opportunities for the local community and will contribute to establishing Whenuapai as a compact and accessible centre where employment and residential opportunities are seamlessly integrated. In addition, the proposed roading upgrades and new infrastructure will improve the connectivity of the PPC land to the surrounding Whenuapai area and greater region of Auckland.

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

1. *Sustainable urban development in Whenuapai*
2. *Quality built urban environment*
3. *A well-connected Whenuapai*
4. *The national significance of Whenuapai Airbase*
5. *The provision of infrastructure*
6. *Enhance the natural environment and protect natural heritage*
7. *The provision of quality open spaces*

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

- The proposed Light Industry zoning will enable a range of future-focused, business development opportunities that will establish local jobs within close proximity to existing and anticipated residential development, which also addresses the impacts of climate change by reducing car trips to other employment centres across the region (Objective 1).
- A considerable range of roading infrastructure is proposed to support the upgrading of Whenuapai’s street network, such as signalised intersections, road widening, roundabouts, public transport facilities (including the provision of land for bus stops) and pedestrian and cycling facilities across the PPC land and to the surrounding area (Objective 2 & 3).
- The proposed Precinct provisions incorporate a range of standards and rules that recognise the national significance of the RNZAF Base Auckland and ensure that it can continue to operate in an efficient manner (Objective 4).
- The PPC is supported by a comprehensive Stormwater Management Plan which incorporates key stormwater management principles that address the site-specific

requirements and align with the provisions of the regionwide Network Discharge Consent ('NDC') (Objective 5).

- Significant native planting across the PPC land and the protection of ecological features, such as waterways and wetlands, are proposed to not only enhance the existing features on the PPC land but also to safeguard and protect ecological features into the future (Objective 6).
- Linkages to the future neighbouring Council reserves have been proposed to ensure public access and connectivity between the PPC land and the future open space (Objective 7).

Furthermore, the WSP identifies the PPC land as ready for development under Stage 1E, which includes land that can be development ready between 2017-2027. The WSP identifies transport and infrastructure projects that may be constructed or upgraded in the Whenuapai area. The projects relevant to the PPC (Stage 1E) are outlined below:

- RTN/FTN along SH16 with station at Brigham Creek Road interchange.
- Construct a new road into the industrial area from Brigham Creek Road east of Trig Road.
- Urbanisation of Trig Road between Brigham Creek Road and SH18 Interchange.
- Traffic signals at the Brigham Creek Road / Trig Road intersection.

The PPC has incorporated aspects that support the wider transport network, as also discussed in Section 10.8. New roading is proposed off Brigham Creek Road into the industrial area, and Trig Road is proposed to be upgraded to an urban standard along the PPC frontage. After extensive discussions with Auckland Transport, it was determined that a roundabout was the preferred option for the Trig/Brigham Creek Road intersection. Bus stops are also proposed as part of the PPC infrastructure works and will support future and existing bus routes, such as the western express bus route which commenced in mid-November and provides buses between Westgate and the city every 10-minutes during peak travel times, and every 15-minutes otherwise.

It is therefore considered that the PPC has been developed to give effect to the overall objectives and aspirations of the Whenuapai Structure Plan and, where required, provides suitable infrastructure alternatives to ensure consistency with the infrastructure upgrades under the plan.

10.10 The Auckland Unitary Plan – Regional Policy Statement

When preparing or changing a district plan, Council must give effect to any Regional Policy Statement ('RPS').¹⁴ The RPS seeks to achieve the purpose of the RMA by providing an overview

¹⁴ s75(3)(c) RMA

of the resource management issues for the region and establishing policies and methods to achieve integrated management of the region’s natural and physical resources.

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

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

It is considered that the following objective are also relevant for the application:

B2.2.1. Objectives

- (1) A quality compact urban form that enables all of the following:
“...
(c) better use of existing infrastructure and efficient provision of new infrastructure;
(d) improved and more effective public transport;*
- (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:
(a) Is integrated with the provision of appropriate infrastructure*

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

B2.2.2 Policies

Development capacity and supply of land for urban development

- (1) Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years’ projected growth in terms of residential, commercial, and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.*

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

Quality compact urban form

- (7) *Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following:*
- (a) *support a quality compact urban form;*
 - (b) *provide for a range of housing types and employment choices for the area;*
 - (c) *integrate with the provision of infrastructure; and*
 - (d) *follow the structure plan guidelines as set out in Appendix 1.*

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

B2.5.1 Objectives

- (1) *Employment and commercial and industrial opportunities meet current and future demands.*
- (2) *Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that supports a compact urban form*
- (3) *Industrial growth and activities are enabled in a manner that does all of the following:*
 - (a) *promotes economic development;*
 - (b) *promotes the efficient use of buildings, land, and infrastructure in industrial zones;*
 - (c) *manages conflicts between incompatible activities;*
 - (d) *recognises the particular locational requirements of some industries; and*
 - (e) *enables the development and use of Mana Whenua’s resources for their economic well-being.*

B2.5.1 Policies

- (7) *Enable the supply of land for industrial activities, in particular for land-extensive industrial activities and for heavy industry in areas where the character, scale and intensity of the effects from those activities can be appropriately managed.*
- (8) *Enable the supply of industrial land, which is relatively flat, has efficient access to freight routes, rail or freight hubs, ports, and airports, and can be efficiently served by infrastructure.*

Due to the PPC land’s proximity to future open space and streams, the following objectives and policies relation to open space are also considered to be relevant:

B2.7.1 Open space and recreation facilities objectives

- (2) *Public access to and along Auckland’s coastline, coastal marine area, lakes, rivers, streams, and wetlands is maintained and enhanced.*

- (3) *Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied, or mitigated.*

B2.7.2. Policies

- (2) *Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.*
-
- (7) *Avoid, remedy, or mitigate significant adverse effects of land use or development on open spaces and recreation facilities.*

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

B3.2.1 Infrastructure Objectives

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

B3.3.1 Transport Objectives

- (1) *Effective, efficient, and safe transport that:*

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

B3.3.2 Transport Policies

- (1) Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.*
- (2) Enable the movement of people, goods and services and ensure accessibility to sites.*
- (3) Identify and protect existing and future areas and routes for developing Auckland’s transport infrastructure.*
- (4) Ensure that transport infrastructure is designed, located and managed to:*
.....
- (5) Improve the integration of land use and transport by:*
....

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

- It provides for the rezoning of land within the Rural Urban Boundary to accommodate for industrial demand, as anticipated by the PPC land’s Future Urban zoning (B2.2.2(1)).
- The proposed rezoning is generally consistent with the WSP, which was completed in accordance with Appendix 1 Structure plan guidelines and includes sufficient infrastructure upgrades to support the PPC and wider surrounding area (B2.2.2(3)).
- It supports a quality compact urban form, through the provision of in demand industrial land to support employment choice and access in an area with existing and anticipated residential areas (B2.2.2(7)).
- The PPC includes a range of new infrastructure and upgrades of existing infrastructure that is generally consistent with the planned infrastructure for the area and where not achievable, suitable alternatives have been proposed that will sufficiently service both the PPC land, and the wider surrounding area into the future, whilst not impeding future infrastructure upgrades (B2.2.2(7)), (B3.2.1(5) and B3.2.2(5)).

- The PPC will contribute to a quality compact urban form by enabling the upgrading of existing infrastructure and requirements for new/upgrades to existing infrastructure to be integrated with future development to ensure the necessary upgrades are in place before development proceeds. The proposed infrastructure upgrades include the provision of bus stops to connect the PPC land to the surrounding public transport network, further supporting a quality compact urban form (B2.2.1 (1)(c) & (d) and (5)(a)).
- It enables the provision of critically needed industrial capacity in an area where land for this purpose is scarce, and will enable significant employment opportunities, whilst still ensuring that the function and operation of surrounding existing uses are not impacted (B2.5.1(1) & (3)).
- The location of the PPC is suitable for industrial activities, particularly land extensive industrial activities, and incorporates a range of bespoke Precinct provisions to ensure any potential future effects arising from the industrial activities are appropriately managed and mitigated (B2.5.1(7)).
- The proposed rezoning will enable the supply of land in a strategic location within close proximity to key transport routes, such as State Highways 16 and 18, and the strategic freight network route (B2.5.1(8)).
- The PPC provides for walking and cycling infrastructure across the PPC land and surrounding existing road network, as well as to the future adjoining open space via a pedestrian/cycleway connection to ensure the future reserve land is accessible for the general public (B2.7.1(2)) & (B2.7.2(2)).
- Specific Precinct provisions are proposed to manage the interface between the PPC and the adjoining future open space to ensure any reverse sensitivity effects are appropriately remedied and mitigated (B2.7.1(3)) & (B2.7.2(7)).
- The PPC integrates with surrounding existing and proposed land uses through the transport linkages proposed, such as the pedestrian and cycle connections, and will protect and enhance the natural features on the PPC land by the proposed riparian setbacks and native planting (B3.2.1(2)).
- The PPC includes specific Precinct provisions to mitigate reverse sensitivity effects on to surrounding existing infrastructure, such as the Whenuapai Airbase, to safeguard the ongoing operation and use of existing infrastructure (B3.2.1(6)).
- The proposed internal road network and upgrades to the existing road networks are proposed to support the rezoning and will be fully funded by the applicant. The

proposed roading infrastructure will integrate the PPC with the surrounding environment to both enable industrial growth but also to facilitate transport choice through the walking, cycling and public transport infrastructure proposed. The PPC includes infrastructure upgrades that avoid the need for planned infrastructure projects to be in place and suitably managed any adverse effects on to the surrounding transport network (B2.2.1 (1)(d) and B3.3.2(1) & (5)).

- The PPC includes upgrades to existing transport infrastructure and the provision of new transport infrastructure to ensure suitable access is provided to the PPC land in a way that considers surrounding land uses and future development growth. The PPC will not inhibit future transport upgrades from occurring and has been designed to integrate with any future upgrades (B3.3.2(1) to (4)).

10.11 The Auckland Unitary Plan – Objectives and Policies

10.11.1 Zoning: H17 Business – Light Industry Zone

The PPC seeks to identify the PPC land as LIZ and a proposed new Whenuapai Business Park Precinct. The way in which the PPC will give effect to the relevant AUP objectives and policies in relation to the LIZ and the relevant city-wide objectives and policies is discussed below.

The objectives and policies of the LIZ are set out below:

H17.2. Objectives

- (1) Light industrial activities locate and function efficiently within the zone.*
- (2) The establishment of activities that may compromise the efficiency and functionality of the zone for light industrial activities is avoided.*
- (3) Adverse effects on amenity values and the natural environment, both within the zone and on adjacent areas, are managed.*
- (4) Development avoids, remedies, or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones*

H17.3. Policies

- (1) Enable light industrial activities to locate in the zone.*
- (2) Avoid reverse sensitivity effects from activities that may constrain the establishment and operation of light industrial activities.*
- (3) Avoid activities that do not support the primary function of the zone.*
- (4) Require development adjacent to open space zones, residential zones, and special purpose zones to manage adverse amenity effects on those zones.*

The LIZ provides for a wide range of activities that do not generate objectionable odour, dust, or noise. These activities can include manufacturing, production, logistics, storage, transport,

and distribution activities. The objectives and policies of LIZ seek to enable sufficient use of the land resource and enable a range of industrial uses as a permitted activity and discourages activities that may compromise the efficiency of the zone.

The Light Industry zoning of the PPC land, in combination with the provisions proposed in the Precinct, would be consistent with these objectives and policies. The PPC land is considered to be an appropriate location for industrial activities to establish as it is suitably located to key transport connections, commercial centres and residential areas that will serve the future industrial activities on the PPC land.

The PPC will give effect to the relevant LIZ objectives and policies as:

- It will enable the provision of in-demand industrial land in an optimal location that is supported by key transport connections, infrastructure, and residential growth.
- It will appropriately manage reverse sensitivity effects on future industrial activities and existing surrounding land uses, as well as future proposed open space.
- It will provide for industrial land uses consistent with the envisaged future use and character of the area.
- It will facilitate the establishment of land extensive industrial activities, which is currently a land use that is significantly undersupplied in the north-west.

10.11.2 Chapter E – Auckland-wide Provisions

10.11.2.1 E1 Water quality and Integrated Management

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

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

As set in Section 10.4.2, the PPC is considered to be consistent with the outcomes sought under the NPS-FW.

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

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

The applicant has prepared a comprehensive Stormwater Management Plan ('SMP') that will manage the water quality effects of any future development. The requirement for compliance with the SMP is integrated into the Whenuapai Business Park Precinct to ensure the outcomes sought under Policy 8 can be achieved by the PPC.

Policy E1.3(10) describes what must be had regard to in an integrated stormwater management approach and includes the use and enhancement of natural hydrological features and green infrastructure for stormwater management where practicable.

The proposed Precinct provisions in relation to stormwater management and water quality are considered to be consistent with the policies and objectives of Chapter E1. The PPC utilises the natural hydrological features of the PPC land as part of the stormwater management and will ensure that all stormwater runoff shall be treated and mitigated prior to discharging to the receiving environment. The treatment of all stormwater runoff from the proposed roading will further maintain and enhance water quality. The extensive replanting of riparian and wetland areas with native vegetation, as well as planting proposed elsewhere on the PPC land, will also enhance the quality of the natural environment.

10.11.2.2 E3 – Lakes, rivers, streams, and wetlands

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

A network of streams is located through the PPC land, notably an unnamed tributary of the Waiarohia stream adjacent to the PPC land. The PPC and the future development enabled by it have been designed to minimise the impact on to the existing streams and no stream reclamation is proposed. Riparian margins are proposed along all identified streams and natural wetlands to safeguard and protect the natural values of the PPC land (Policy 15). It is considered

that the ongoing protection and extensive native planting, eco-sourced where possible, proposed across the riparian and wetland areas on the PPC land is consistent with the following:

Objective

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

Policy

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

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

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

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

All future structures required within or in close proximity to the ecological features on the PPC land will be designed to minimise impacts where practicable. In addition, stream works will include the removal of existing culverts and the reinstatement of stream beds to further restore and enhance the waterways (Policy 8).

10.11.2.3 E11 and E12 – Land Disturbance – Regional and District

The PPC would be consistent with the anticipated outcomes of the objectives and policies of Chapters E11 and E12. Earthworks are recognised as an essential prerequisite of land development; however, they need to be managed in a way that reduces the amount of sedimentation entering waterways.

The objectives and policies of Chapters E11 and E12 outline the need to manage land disturbance so that the safety of people is protected, adverse effects on the environment are mitigated, and sediment generation minimised. Future development of the PPC land in accordance with the proposed Whenuapai Business Park Precinct, and adherence to the Auckland-wide earthwork provisions, will ensure that the outcomes sought by the provisions of Chapters E11 and E12 are met. Therefore, the PPC is considered to be consistent with these policies and objectives.

10.11.2.4 E15 – Vegetation Management and Biodiversity

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

The objectives and policies seek to ensure that vegetation contributes to a range of ecosystem services such as erosion and sediment control, reducing stormwater flows, protecting, or enhancing water quality, amenity, and natural character values, and mitigating natural hazards. Vegetation is a crucial part of terrestrial ecosystems and helps maintain indigenous biodiversity.

Overall, although a minimal level of native vegetation removal will occur to facilitate future development, the PPC is considered to be consistent with the relevant objectives and policies. The PPC will more than off-set the negligible native vegetation removal via the proposed native planting across the riparian and wetland areas, a significant improvement from the existing, degraded habitat on the PPC land. In addition, the PPC seeks to provide for additional planting across the PPC land as identified within the Precinct provisions, which will further contribute to biodiversity and native habitats.

10.11.2.5 E27 – Transport

Objectives (1) – (5) and Policy (1).

Objectives and policies in E27 seek to support and manage the effects on the operation and development of an integrated transport network. The AUP seeks to ensure that:

- (1) Land use and all modes of transport are integrated in a manner that enables:
 - (a) the benefits of an integrated transport network to be realised; and*
 - (b) the adverse effects of traffic generation on the transport network to be managed.**
- (2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.*
- (3) Parking and loading is managed to support urban growth and the quality compact urban form.*
- (4) Parking, loading, and access is safe and efficient and, where parking is provided, it is commensurate with the character, scale and intensity and alternative transport options of the location.*
- (5) Pedestrian safety and amenity along public footpaths is prioritised*

The proposed approach to roading upgrades, the provision of new roading infrastructure, integration with the existing transport network and the traffic effects of the PPC have been assessed by Team Consultants (**Appendix D**). Specific Precinct provisions and the staging of transport infrastructure have been incorporated into the PPC to provide for the safe and efficient operation of the surrounding transport network.

As noted by Team, the PPC includes staging for the provision of transport infrastructure and is considered to ensure that future development of the PPC land will not outpace the provision of transport infrastructure. The proposed roading upgrades account for future growth and incorporate provisions for future bus stops to provide for the anticipated growth of public transport in the area. In addition, pedestrian and cycling facilities are proposed across the PPC land, as well as linkages to the surrounding area to further encourage active transport modes and public transport.

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

10.11.2.6 E36 – Natural Hazards and Flooding

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

The PPC is considered to have sufficiently addressed the flooding on the PPC land and is consistent with the policies and objectives of E36. The Flood Hazard Assessment and Stormwater Management Plan prepared by Cato Bolam outline the flood hazards on the PPC land and find that the PPC will not create further flood risk or exacerbate the existing flood risk on neighbouring properties and the downstream environment. The effects of the PPC on the existing flooding is considered to be negligible and additional mitigation measures are proposed (as assessed in detail in the Flood Hazard Assessment in **Appendix K**).

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

10.11.2.7 E38 – Subdivision

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

The objectives and policies in E38 seek to ensure that subdivision is undertaken in a manner that achieves the objectives of the underlying zones, any applicable precincts, and the Auckland-wide provisions. Subdivision should provide for the long-term needs of the community and minimise adverse effects of development on the environment. Infrastructure should be provided in an integrated manner and be in place when subdivision occurs. Subdivision must have a layout that is safe, efficient, convenient, and accessible and that supports a well-functioning urban environment.

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

The PPC is considered to be consistent with the relevant objectives and policies found in Chapter E38. Development cannot proceed unless infrastructure is in place as per the staging plan and the relevant provisions outlined within the Whenuapai Business Park Precinct. Streams and natural wetlands identified on the PPC land are protected via riparian margins and the proposed restoration planting will further enhance these areas. Stormwater management will also be integrated with the riparian areas. Sufficient provision has been made for roads and infrastructure to ensure safe and efficient access across the PPC land, as well as access to infrastructure services.

10.12 Conclusion regarding the Statutory Framework

The PPC is considered to be consistent with the outcomes of the Auckland Plan 2050. That plan places a strong focus on providing business and employment opportunities, while also enabling the integration of land use and transport infrastructure. The proposed zoning and Precinct is consistent with the NPS-UD because it will contribute, over the medium to long term, business land and employment opportunities to meet the significant demand from a rapidly growing region.

Regarding the AUP, the PPC directly and positively addresses major themes of the RPS, particularly in relation to achieving integrated land use and transport infrastructure with specific Precinct provisions to address the features and existing uses of the surrounding area, while still enabling the anticipated industrial uses to occur on the land.

The PPC is consistent with the general objectives and policies of the Light Industry zone and meets the outcomes sought for industrial activities. The PPC's inclusion of Precinct provisions specific to the Whenuapai context will ensure that the ongoing use, function, and amenity of surrounding existing activities are not compromised, whilst still enabling the economic opportunities provided for by the rezoning to be achieved.

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

10.13 Other Relevant Planning Documents

10.13.1 Upper Harbour Local Board Plan 2020

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

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

One of the Upper Harbour Local Board Plan’s objectives to support the local economy is to increase local employment opportunities and reduce the need to commute across the region, while reducing environmental damage through less congestion. Another key aim of the Upper Harbour Local Board Plan is to protect existing waterways and to shift towards more active transport options.

The PPC will directly contribute to the local economy by providing sought after industrial land within close-proximity to both housing and transport links, and integrate with active transport modes through walking and cycling provisions. In addition, the proposed Precinct provisions will ensure that the proposed land use does not compromise the existing ecological features via the proposed riparian protection areas and extensive native planting proposed across the PPC land. Overall, it is considered that the PPC will not be contrary to the Upper Harbour Local Board Plan and will assist in delivering many of the outcomes sought.

10.13.2 Upper Harbour Greenways Plan

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

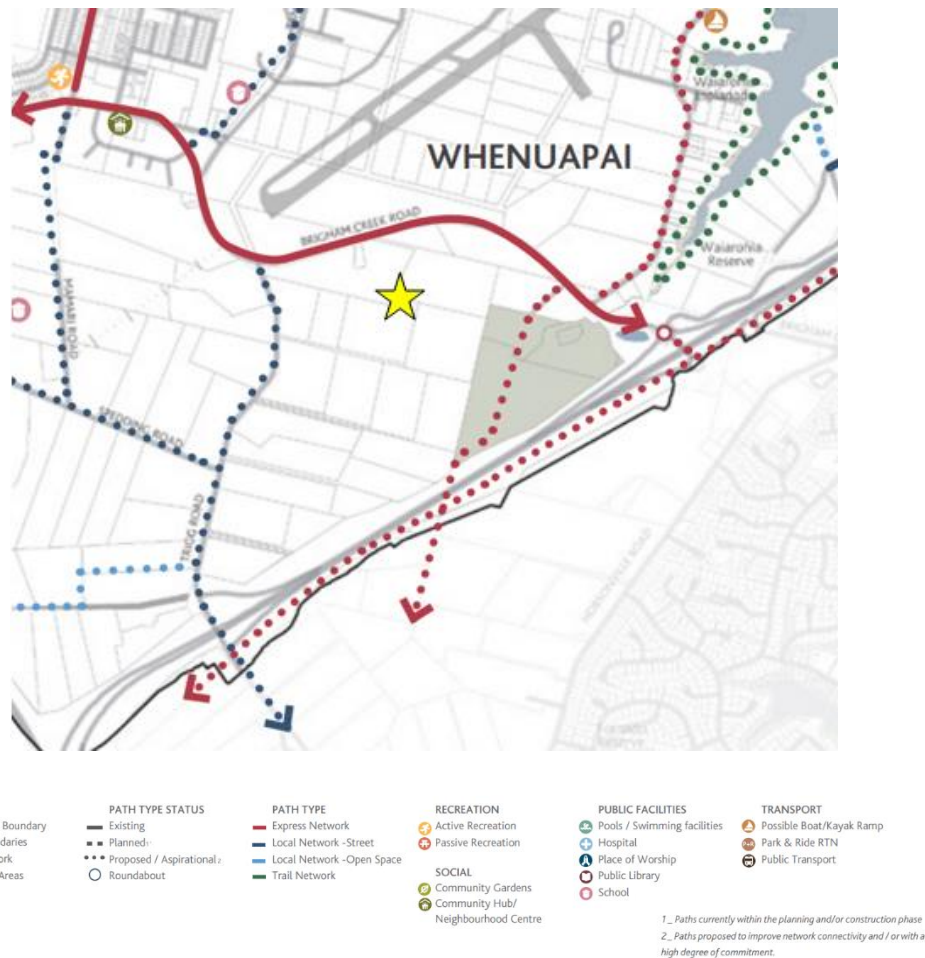


Figure 28 - Greenways Plan in relation to the PPC land

The Council owned land to the east of the PPC (161 Brigham Creek Road) is anticipated to be a recreation reserve and includes a proposed path from Brigham Creek Road to the Upper Harbour Motorway and surrounding area. Paths are also proposed along Trig Road.

The PPC has considered the recreation areas and linkages proposed by providing an indicative connection from the PPC land to the proposed recreation reserve to the east, as well as pedestrian and cyclist connections through the PPC land on to Trig Road. The proposed pedestrian and cyclist connections are then proposed to continue on to the Council owned land at 92-94A Trig Road and 2 Spedding Road to the south of the PPC land, that is also earmarked for a recreation reserve (not shown on the greenways plan), to create a linkage between the proposed green spaces. The proposed pedestrian and cycling facilities to both Trig and Brigham Creek Road will achieve further connectivity in the area and are consistent with the plan.

It is therefore considered that the aspirations of the Greenways Plan for Whenuapai have been integrated into the PPC to ensure linkages and access is provided to the anticipated recreation areas.

11.0 Environmental Effects

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

- Ecological Impact Assessment prepared by Viridis (**Appendix A**)
- Acoustic Report prepared by Marshall Day Acoustics (**Appendix C**)
- Integrated Transport Assessment prepared by Team Consultants (**Appendix D**)
- Economic Assessment prepared by Insight Economics (**Appendix J**)
- Flood Risk Hazard Report prepared by Cato Bolam (**Appendix K**)
- Stormwater Management Plan prepared by Cato Bolam (**Appendix N**)
- Infrastructure Report prepared by Cato Bolam (**Appendix O**)
- Geotechnical Assessment Report prepared CMW Geosciences (**Appendix P**)
- Site Investigation Report prepared by Geosciences (**Appendix Q**)
- Archaeological Assessment Report prepared by Clough & Associates (**Appendix R**)
- Urban Design Report prepared by Ian Munro (**Appendix S**)
- Landscape Visual Assessment prepared by Sola Landscape Architects (**Appendix T**)

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

Furthermore, in addition to the proposed zoning and Precinct, the PPC will rely upon existing chapters of the AUP to appropriately manage and mitigate adverse effects. Such as the relevant overlays within Chapter D and the relevant Auckland-wide provisions within Chapter E of the AUP.

11.1 Ecological Effects

An ecological assessment of the PPC has been undertaken by Viridis and is provided in **Appendix A**. The ecological report outlines the existing ecological values of the PPC land and the potential effects of the PPC on those values. The assessment of the PPC land included a desktop review, site visits and site assessments, during which the presence and extent of freshwater and terrestrial features within the PPC land and surrounding area were identified. The assessment identified the presence of permanent and intermittent waterways, natural inland wetlands, and a small area of planted indigenous vegetation.



Figure 29 - Ecological features identified on the Site

The assessment undertaken by Viridis focused on the following key areas:

- Ecological connectivity and function
- Pest animals
- Terrestrial indigenous fauna
- Freshwater ecology
- Riparian margins
- Wetlands
- Stormwater

Viridis found that vegetation values within the PPC land are significantly limited due to the presence of exotic vegetation, with the area of native vegetation identified on the PPC land being planted no more than 20 years ago. There are no Significant Ecological Areas (SEA's) present on within the PPC land and the majority of vegetation on the site is limited to the riparian areas. It is therefore considered that the proposed rezoning will have low adverse effects on the existing vegetation due to vegetation being protected by the proposed riparian yards and the proposed additional planting provisions, such as the open space buffer, front yard landscaping and native planting precinct standards, will further enhance the vegetation on the PPC land from its current state. In addition, the proposed rezoning will result in a negligible increase of pest animals due to a likely increase in trappings/poisonings from the urbanisation of the PPC land.

Furthermore, due to Viridis determining that the PPC will result in low adverse effects on vegetation and negligible effects of pest animals, it is also considered that the rezoning will result in a low adverse effects on native terrestrial habitat. A sufficient level of vegetation is considered to be retained within the riparian stream and wetland setbacks for bat roosting habitat and any potential effects on native terrestrial fauna as a result of future works will be subject to future

resource consents and will be effectively managed by consent conditions. It also noted that any subsequent works resulting from the rezoning of the PPC land would result in the same or similar potential adverse effects on native fauna due to the change from more rural to urban land uses required by the policy framework.

It was determined that the ecology of the permanent and intermittent stream identified within the PCC land are of moderate ecological value. However, it is considered that all threats, such as reduced riparian yards, increased impervious areas, and increase in contaminant runoff, to the waterways from the proposed rezoning can be effectively managed during future development via the resource consent and detailed design processes. The effects management hierarchy will be appropriate for managing adverse effects of future proposals and therefore, the proposed rezoning is not anticipated to result in residual adverse effects on the freshwater values of the PPC land. Furthermore, the proposed reduction in riparian setbacks from the 20m FUZ setback to the 10m LIZ setbacks is considered appropriate and consistent with the proposed zoning and will greatly improve the ecological value of the riparian areas through the extensive native planting proposed.

Viridis identified six wetlands on the PPC land and in the immediate surrounds. The proposed riparian precinct provisions require a 10m setback from the edge of the wetlands to be planted with native vegetation to ensure ongoing enhancement and protection of the wetlands. Whilst the urbanisation of the PPC land does pose a pathway for works within the wetlands, it is considered that any adverse effects on natural inland wetlands will be able to be assessed and managed appropriately at the future resource consent stage. Furthermore, the Stormwater Management Plan (SMP) prepared for the PPC ensures that the effects of increased impervious area are effectively managed in relation to the ecological features on the PPC land and will assist with the reduction of contaminants and sediment entering waterways.

Viridis's assessment of the PPC concludes with the following:

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

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

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

11.2 Acoustic Effects

An acoustic assessment has been prepared by Marshall Day Acoustics to support the PPC and is provided in **Appendix C**. As highlighted previously, the PPC land is within close proximity to the RNZAF Base Auckland and the western side of the PPC land is subject to the Whenuapai Airbase Aircraft Noise overlay. The assessment addresses the Whenuapai Airbase noise related planning standards, including the non-statutory Whenuapai Airbase Engine Testing Noise contours proposed under the now withdrawn PC5, and identifies the impact of the planning standards on the types of activities that may establish on the PPC land as a result of the PPC.

The Aircraft Noise overlay consists of two aircraft noise boundaries defined as 55 dB Ldn and 65 dB Ldn noise boundaries, with parts of the PPC located within both boundaries. The main purpose of the Aircraft Noise overlay is to restrict certain activities that are sensitive to aircraft noise and requires acoustic insulation and ventilation standards to be met.

The Engine Testing Noise contours proposed under PC5 are located over the north third of the PPC land between the 57 and 65 dB Ldn engine testing noise contours. Refer to **Figure 30** below, which shows both the operative overlay and the withdrawn contours under PC5.

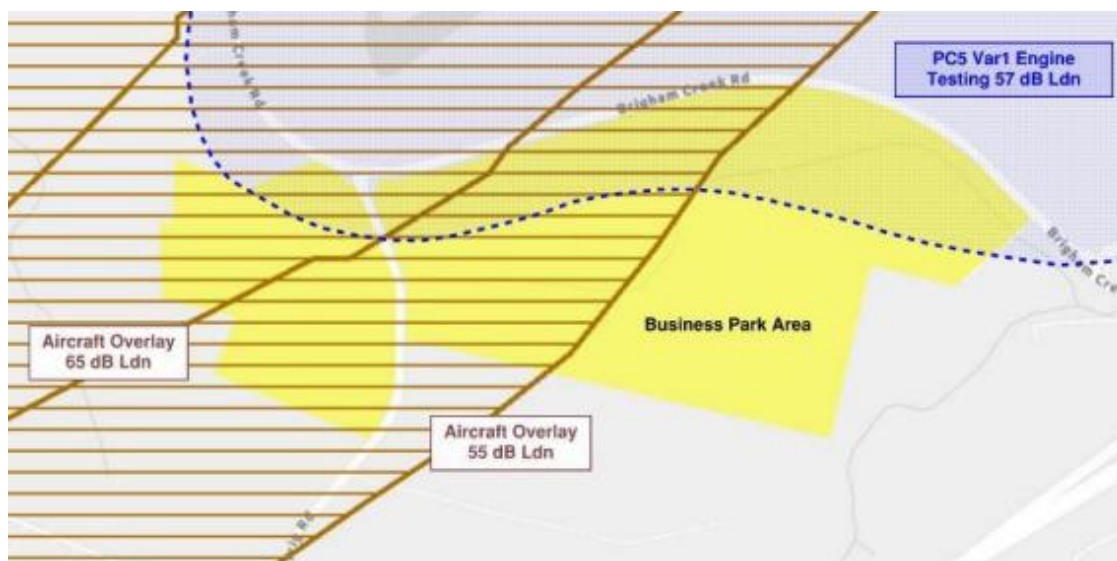


Figure 30: Aircraft Overlay and Engine Testing Noise Contours over the Site

The proposed Light Industry zoning provides for activities that are considered sensitive to aircraft noise under the Aircraft Noise overlay and therefore might be established within the PPC land. These activities include:

- Worker’s accommodation
- Tertiary education facilities
- Care centres

- Hospitals

It is proposed to include specific standards within the Precinct provisions to manage the effects of aircraft noise and engine testing on to the PPC land. The Precinct provisions propose to make the above activities, that do not comply with the relevant standards, sensitive to aircraft noise a discretionary activity to ensure activities sensitive to aircraft noise could not be established as of right. Other activities sensitive to aircraft noise, as outlined in Table 1 of the provided acoustic assessment, are already classified as a non-complying activity under the LIZ. In addition, in the event that any of the activities sensitive to aircraft noise were established, they would need to achieve the acoustic insulation and ventilation standard of the overlay. Marshall Day supports this approach and considers that it ensures that specific acoustic or reverse sensitivity effects of such developments are assessed on a case-by-case basis via the resource consent process and their effects will be appropriately addressed.

11.3 Transport Effects

Traffic and transportation effects have been comprehensively considered in the Integrated Transport Assessment ('ITA') prepared by Team Consultants in **Appendix D**. The transport infrastructure and upgrades proposed under the PPC are a result of extensive consultation and collaboration with Auckland Transport and Auckland Council, with input from SGA also provided.

A peer review of the transport related aspects of the PPC has also been undertaken by Don McKenzie from Don McKenzie Consulting and is provided in **Appendix L**. Mr McKenzie worked closely with Team Consultants in the framing of the content and structure of the ITA and provided advice in relation to transportation related matters related to the PPC. The peer review outlines the key transport issues and concludes that these matters are appropriately addressed within the Team ITA.

Precinct provisions and a staging plan have been proposed to sufficiently manage the provision of transport infrastructure and to ensure integration with the existing and proposed surrounding road network. The ITA has been formed around the following key transport matters:

- Consideration of the existing and future land use and transport networks in the surrounding area.
- Incorporation of a range of transport modes.
- Integration with key national and regional strategies.
- Providing the appropriate mitigation to ensure the surrounding road network operates safely and efficiently to support the PPC and other future development.

The proposed Precinct Provisions, Precinct Plan and Staging Plan outline the new infrastructure and roading upgrades proposed. To briefly summarise, the proposed new infrastructure and roading upgrades include a new internal road network, the upgrading of Brigham Creek and Trig

Road along the PPC frontage, integration of active modes (such as walking and cycling), and new intersections to connect the PPC to the surrounding area. The Precinct Provisions also include a Trip Generation Standard which states that the Gross Floor Area within the Precinct shall not exceed 115,000m² unless a traffic monitoring report prepared by a suitably qualified expert shows that the peak hour trip generation from all existing or consented development in the Precinct does not exceed 725 vehicles per hour. This standard will ensure that the PPC land is not developed beyond its capacity by requiring any development above the identified threshold to undergo a robust assessment.

The proposed internal road network consists of three roads that have been indicatively designed to cater for industrial uses. Each road is proposed to be 24 m in width and will consist of one traffic lane in each direction, recessed parking bays, berms, and separated footpaths and cycleways that connect to both Brigham Creek and Trig Road. The proposed road cross sections align with the roading guidelines and standards provided in Auckland Transport’s Transport Design Manual (‘TDM’), including consistency with the 8 m carriageway width for freight traffic under the TDM. Based on the above, it is considered that the proposed internal roading network is suitable for the proposed Light Industry zoning.

As outlined in Team’s report, the PPC includes a range of new intersections and the upgrades of existing intersections and roads, as detailed below:

- A new signalised intersection off Brigham Creek Road.
- A new left-in-left-out intersection off Brigham Creek Road.
- A new roundabout intersection off Trig Road.
- The upgrade of the existing Brigham Creek and Trig Road priority controlled intersection with a single-lane roundabout.
- The upgrading of Brigham Creek and Trig Road along the PPC frontage.

Through the design and consultation process, considerable constraints were identified that inhibited the upgrades of the existing roads and intersection in accordance with the upgrades envisaged by Auckland Transport and SGA. These constraints include the NZDF land to the north and west of the PPC land and the Spark site located within the PPC land to the south of Brigham Creek Road. These sensitive land uses mean they are not available for the envisaged roading and intersection upgrades and, instead, an interim solution has been proposed. This includes a single lane roundabout to replace the existing Brigham Creek/Trig Road intersection and the upgrading of Brigham Creek Road along the PPC frontage to an urban standard with a single traffic lane in each direction, which is supported by Auckland Transport.

Trig Road along the PPC frontage will be upgraded to an urban standard consistent with SGA’s cross-section and road design, which also aligns with Auckland Transport’s Roads and Streets Framework. The proposed road upgrade include pedestrian and cycling facilities, as well as provision for future bus stops to accommodate for future public transport growth. Furthermore,

the modelling undertaken by Team shows that the new roading and upgrades proposed to existing transport infrastructure can accommodate the traffic generated by a fully developed PPC without compromising the function of the road network. Team’s assessment concludes with the following:

“The descriptions, analyses and assessments provided in this report have shown that:

- *the proposed road cross sections and network will provide for ready and convenient accessibility of the site by all transport modes: walking, cycling, bus and private vehicles.*
- *the development enabled by the WBPPC is consistent with, and will give effect to, national, regional and district transport policies.*
- *the proposed transport network to support the plan change supports the Te Tupu Ngatāhi Supporting Growth’s Northwest Indicative Transport Network goals*
- *the extent of development anticipated as a consequence of the WBPPC can be accommodated by the surrounding road network while maintaining acceptable levels of safety and performance, given the proposed upgrade to Brigham Creek Road and Trig Road.*

Accordingly, it is concluded that there is no traffic engineering or transportation planning reason to preclude approval of this WBPPC, since the full extent of development enabled by the plan change will be appropriately supported by a new road network and upgrades to existing roading to maintain and enhance appropriate levels of safety and efficiency on the surrounding road network.”

Therefore, it is considered that any adverse transport effects on to the environment as a result of the PPC would be able to be avoided, remedied, or mitigated by the transport infrastructure proposed.

11.3.1 Travel pattern effects

While substantial residential growth has occurred across Auckland’s fringe suburbs, the development of suitable employment land has not occurred at the same pace and has resulted in people travelling large distances to reach employment hubs such as Wairau Valley, East Tāmaki (Highbrook) and Auckland Airport. This in turn directly contributes to greater levels of Vehicle Kilometres Travelled (‘VKT’) in order for people to reach their place of employment. It is considered that the PPC will provide employment land to support the existing and anticipated housing not only in Whenuapai but the wider north-west region so people can live and work without having to rely on significant vehicle trips. In addition, providing employment land within close proximity to both existing and planned residential areas is key to achieving positive transport outcomes for the region.

As highlighted by the below figure, existing commuter patterns show that a considerable number of people currently travel outside of the north-west area to reach their place of work.

This results in an estimated annual private VKT of 20 million, which greatly contributes to greenhouse gas emissions.

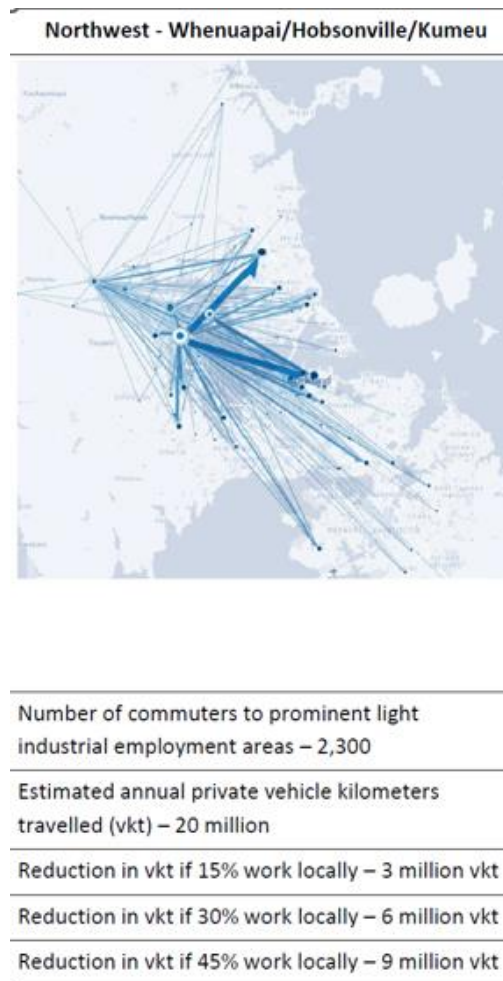


Figure 31 - Vehicle Kilometres Travelled for Auckland's North-West 2018 Census Data

The PPC is considered to directly contribute to reducing VKT and will enable more people to live and work in Whenuapai. A 15% increase of people working locally would reduce VKT by 3 million, with a 45% increase reducing VKT by 9 million; a considerable decrease that will greatly assist in minimising greenhouse gas emissions. While it is acknowledged that the PPC will still contribute to emissions, the benefits of establishing an employment hub that over time will enable more people to live and work in the same area, is considered to support a well-functioning urban environment.

Furthermore, as indicated by the below figure from the Commuter Waka App, a significant travel pattern that has been identified is people who reside in Auckland's north-west (shown in green; Kumeu-Huapai, Riverhead and Waimauku) travelling to North Harbour as their main work destination. As there is no direct connection between State Highways 16 and 18, this commuter traffic travels directly along Brigham Creek Road past the PPC land. The PPC provides an

opportunity to reduce the distance of commuter trips by the provision of industrial land and subsequent employment opportunities within closer proximity to residential areas.

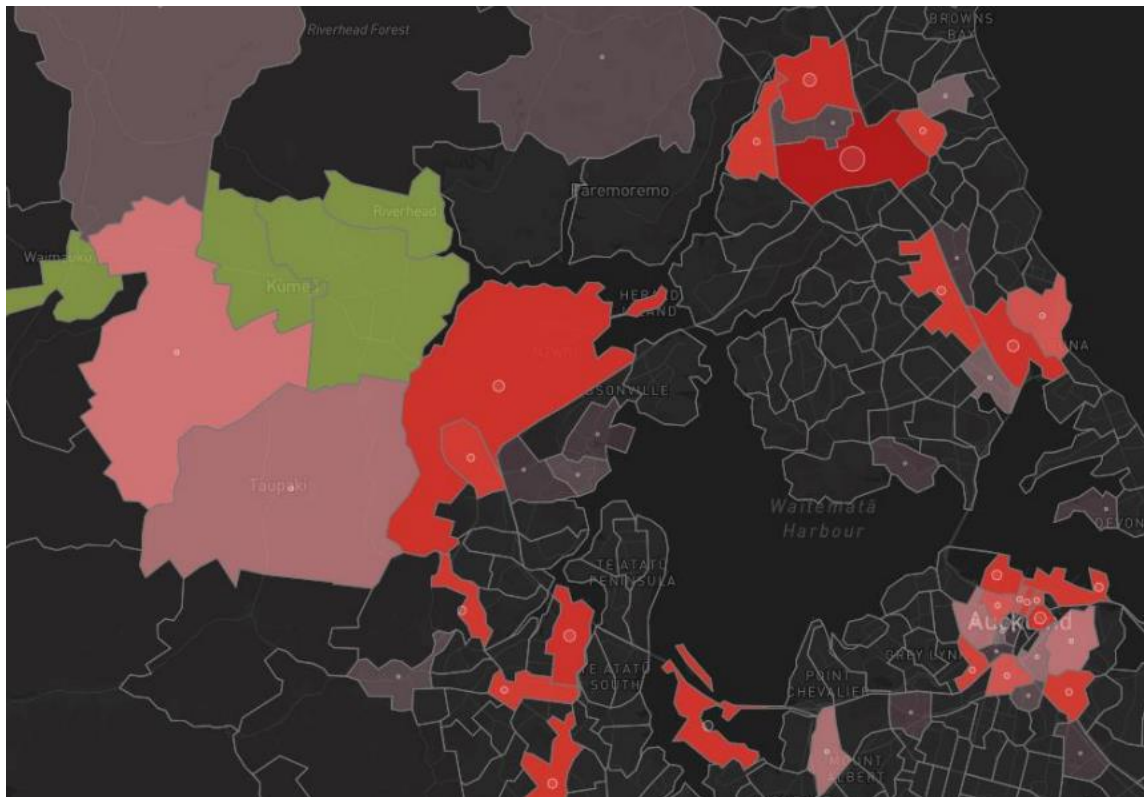


Figure 32 - Commuter Waka App Map of existing commuter patterns for the north-west

In addition, as evidenced by the Land Supply Report prepared by JLL Logistics, the historic undersupply of industrial land in the north-west has greatly contributed to industrial uses being located elsewhere in Auckland and in turn, has impacted commuter patterns for the north-west. It is considered that the PPC will provide employment opportunities for people residing in the north-west and reduce the need for people to travel across the Auckland region. In addition, locating employment and residential areas within proximity to each other will encourage the use of public transport and active modes, such as cycling, to further reduce dependency on private vehicles.

11.4 Effects on Mana Whenua

A complete outline of Mana Whenua engagement is provided in **Appendix I** and the Cultural Impact Assessment prepared by Te Kawerau ā Maki is provided in **Appendix U**. Copies of correspondence with Te Kawerau ā Maki is also provided in **Appendix U**.

To summarise, the applicant has contacted and engaged with the below Mana Whenua groups that hold an interest in the area where the PPC land is located:

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

Of the above Mana Whenua groups, responses from Ngāti Te Ata (confirmed no engagement is required), Ngāti Manuhiri (deferred to Te Kawerau ā Maki) and Te Rūnanga o Ngāti Whātua (expressed interest in the application but no confirmation on whether a Cultural Impact Assessment (‘CIA’) is to be provided) have been received. No response has been received to date from the remaining Mana Whenua groups. The applicant is committed to ongoing collaboration with Mana Whenua and will continue to engage through the PPC process.

It is noted that under the previous Fast-track application, the applicant has fostered an on-going relationship with Te Kawerau ā Maki and acknowledges the connection that Te Kawerau ā Maki has, as Mana Whenua, with the Whenuapai area. Under the Fast-track application, Te Kawerau ā Maki provided a CIA for the previously proposed development on land that is now included as part of this PPC. Whilst it is acknowledged that a greater land area is now proposed under this PPC, and only Te Kawerau ā Maki can determine or speak for spiritual or cultural values and associations that the iwi has with the whenua and the Whenuapai area, it may be of assistance to outline the potential cultural impacts identified by Te Kawerau ā Maki in their previously provided CIA. These potential impacts and how the PPC addresses these matters are outlined in the below table:

Aspect	Summary of impact	Proposed mitigation/precinct provisions
Te Wai te matā o Kahu	<p>Direct, indirect, and cumulative temporary and permanent adverse from stormwater discharge carrying sediments and contaminants.</p> <p>Potential combined neutral-beneficial impact if stream and ecological enhancement works undertaken and robust stormwater systems in place</p>	<p>Undertaking stream and wetland protection and restoration works within the property footprint. Precinct provisions are proposed to ensure that at the time of subdivision or development, land within 10m of a permanent or intermittent stream or wetland shown on the Precinct plan, must be planted with native vegetation to a minimum of 10m measured from the top of the bank of the stream and/or the wetland’s fullest extent. Exotic species will be removed.</p>

		<p>NCL also intends to employ a 100% native vegetation palette for all street planting/public spaces.</p> <p>The SMP has been prepared in accordance with the Auckland Council Regional Stormwater Network Discharge Consent. All stormwater will be managed in accordance with Auckland Council’s Network Discharge Consent. Precinct provisions will require future subdivision and development to be consistent with the treatment train approach outlined in the stormwater management plan. In terms of stormwater quality management, the following measures are proposed:</p> <p>Structural stormwater Management:</p> <ul style="list-style-type: none"> • Bioretention treatment devices • Erosion protection at outlets • Gross pollutant traps or screens at inlets <p>Non-structural stormwater management</p> <ul style="list-style-type: none"> • Provision of Riparian Margins/planting • Protection and enhancement of existing streams • Erosion and sediment controls during construction activities <p>Stream Hydrology:</p> <ul style="list-style-type: none"> • Bio retention/detention tanks for stormwater treatment • Rip/rap protections shall be provided to minimise erosion.
<p>Whenua (Soils)</p>	<p>Direct and cumulative permanent adverse from bulk earthworks and land-use change removing relatively productive topsoil</p>	<p>High-level earthworks principles that will apply to the future development within the PPC area are outlined below:</p> <ul style="list-style-type: none"> • Proposed earthworks will be designed to practically minimise the cut and fill volumes. • Proposed land modification will retain the 10m riparian margin of intermittent streams and natural

		<p>wetlands where practicable and minimise adverse impacts on the streams and wetlands.</p> <ul style="list-style-type: none"> All earthworks and land modification will be supervised by a suitably qualified geotechnical engineer who will provide the certification to confirm the earthworks completion in accordance with the geotechnical recommendations. <p>Detail earthworks design will be submitted at the resource consent stage.</p>
Te Waiarohia o Ngariki (and tributaries)	Direct, indirect, and cumulative temporary and permanent adverse from installation of drainage pipes/infrastructure, discharge of stormwater, and domestic contaminant discharges.	Stormwater management and sediment controls are proposed via precinct provisions. The SMP recommends a combination of raingardens, proprietary devices, and detention/retention tanks to treat stormwater/allow infiltration, riprap at the stormwater outfalls to prevent scouring, and 10m riparian yard establishment with weed management and native enhancement planting.
Native Vegetation	<p>Direct, indirect, and cumulative temporary adverse from site clearance and earthworks, habitat edge effects</p> <p>Potential direct, indirect, and cumulative permanent beneficial from ongoing weed and pest management and native enhancement planting, habitat enhancement, avian fitness.</p>	<p>Native enhancement planting will be undertaken within 10m riparian margins and throughout the streetscape. Weed species will be removed.</p> <p>Vegetation values within the PPC land are significantly limited due to the dominance of exotic vegetation. The only area of native dominant vegetation is small and has been planted no more than approximately 20 years ago. The majority of the native vegetation within the PPC land is located within the riparian yard of permanent or intermittent waterways, and is therefore protected from removal through riparian yard rules.</p>
Lizards	Direct and indirect permanent adverse from injury or mortality during construction works, loss of habitat (rank grasses), reduction	Due to the low adverse effects on vegetation and the negligible effects of pest animals, the re-zoning will result in a low adverse effect on native terrestrial habitat.

	<p>in habitat quality from urbanisation (noise, light).</p> <p>Potential direct and cumulative permanent beneficial from improved habitat along riparian corridor.</p>	<p>Any potential direct adverse effects on lizards as a result of subsequent development works (e.g., earthworks) would be assessed at the resource consenting phase and can be appropriately mitigated through the implementation of lizard management plans.</p>
Avifauna	<p>Direct, indirect, and cumulative temporary and permanent adverse from injury or mortality during construction works, habitat edge effects, noise pollution, light pollution.</p> <p>Potential direct and cumulative permanent beneficial from improved habitat along riparian corridor.</p>	<p>The existing vegetation provides nesting, roosting, and foraging habitat for native birds within the PPC land, however, the value is limited due to low botanical values of the PPC land. The lack of complete, diverse vegetation significantly limits the ability of the PPC land to provide high value habitat.</p> <p>Any potential direct adverse effects on native terrestrial fauna as a result of subsequent development works (e.g. earthworks) would be assessed at the resource consenting phase and can be appropriately mitigated through the implementation of fauna management plans.</p> <p>The riparian corridor and wetlands will be enhanced.</p>
Aquatic Fauna	<p>Direct, indirect, and cumulative temporary and permanent adverse from loss of small areas of riparian vegetation to accommodate outfalls, construction disturbance to instream features while installing outfalls/infrastructure, sediment discharge during construction, stormwater, and contaminant discharge from roading and private activities (e.g. washing vehicles, spraying round-up).</p> <p>Potential direct and cumulative permanent beneficial from riparian yard protection and enhancement.</p>	<p>Stormwater management controls will be required by the Precinct provisions and SMAF control. This comprises a combination of raingardens proprietary devices and detention/retention tanks to treat stormwater/allow infiltration, use riprap at any stormwater outfalls to prevent scouring, and 10m riparian yard establishment with weed management and native enhancement planting.</p> <p>All threats can be effectively managed during future development with appropriate controls such as erosion and sediment control plans, appropriate design and riparian planting and management.</p> <p>Any future Industrial and Trade Activities will require site and activity specific controls and specific consents in accordance with the AUP,</p>

		and as such, effects will be addressed during future consenting processes.
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Another matter that was raised during the previous Fast-track consent process was in regard to wastewater discharges, more particularly, the effects of emergency overflow discharge from the proposed pump station to facilitate future development. The applicant previously agreed (and maintains that agreement) to consult with Te Kawerau ā Maki on the detailed engineering design for any future pump station, which would include:

1. Location and design of the emergency discharge outlet to minimise emergency discharge to the adjacent stream environment;
2. Heavily vegetating an area immediately surrounding the outlet so that any emergency overflow enters the tributary via a mediation of soil and vegetation (recognising in Te Ao Māori it is only through Papatūānuku and Tāne that the mauri of water might be ‘reset’);
3. Increasing the overflow storage tank capacity (subject to site constraints and Watercare approval);
4. Requesting Watercare Services to accept a permanent emergency generator rather than the currently specified 160 kVA three phase trailer mounted generator (we note that this will be subject to Watercare approval); and
5. The content and requirements of the operating and maintenance plan for the pump station.

The above aspects have been discussed with Watercare as part of the previous Fast-track consent process and through the applicant’s direct engagement in preparing the PPC. Watercare indicated that it is open to considering additional measures to avoid and mitigate the effects of emergency overflow discharge, above its standards outlined in the NDC.

Furthermore, the applicant also incorporated the below recommendations of the CIA into the previous Fast-track consent proposal and is committed to adhering to these aspects for any future development on the PPC land that is facilitated by the PPC:

- *Stream and Streetscape Planting (Kaitiakitanga)*
- *Street naming (Mana Motuhake, Mātauranga Māori, Kaitiakitanga)*
- *Bridge Artwork (Mana Motuhake, Mātauranga Māori, Kaitiakitanga)*
- *Riparian Margin Access (Mana Motuhake, Mātauranga Māori, Kaitiakitanga)*

It is therefore considered, whilst acknowledging that no CIA has been provided solely for the PPC, that the applicant has demonstrated their ongoing commitment to consult with iwi and welcomes further collaboration as the PPC process progresses.

11.4.1 Iwi Management Plan

As touched upon in the previous section, the PPC land is located within the rohe of Te Kawerau ā Maki. The Te Kawerau ā Maki Resource Management Statement (1995) is the Iwi Management Plan (IMP) for Te Kawerau ā Maki for the purposes of the RMA. The IMP provides a roadmap for how Te Kawerau ā Maki intends to manage its rohe, and how it expects the Crown to support this. A review of the statement in relation to the PPC has been undertaken.

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

- The objective and policies within section 2 show how Te Kawerau ā Maki will meet their responsibilities as Kaitiaki by promoting the sustainable management of the environment in accordance with tikanga (Policy 2.2(2)) and requires engagement with all relevant agencies within the rohe to ensure their role as Kaitiaki is given effect to (Policy 2.2(3)).
- Section 3 outlines the process that should be followed for resource consent applications within the rohe.
- Section 4 focuses on advocating for and providing for the social, economic, and cultural well-being of Te Kawerau (Objective 4.1.1) by working with agencies involved in resource management (Policy 4.1.2(2)) and by ensuring that cumulative effects upon Te Kawerau ā Maki are recognised and provided for (Policy 4.1.2(3)).
- The policies contained under section 4.2.2 concern Te Kawerau ā Maki cultural heritage and require the appropriate protections and controls to be established on all heritage sites (Policy 4.2.2(1)), the involvement of Te Kawerau ā Maki in all scenarios where effects may be generated (Policy 4.2.2(2)) and the recognition of Te Kawerau ā Maki spiritual and cultural values (Policy 4.2.2(3) & (4)).
- Section 4.3 outlines Te Kawerau ā Maki responsibility as Kaitiaki in the reburial of kōiwi and protection of artefacts (Objective 4.3.1).
- Section 4.4 outlines the management of water to protect the mauri of all natural waterways and to enhance their life supporting capacity by managing the effects of development on the awa. This is recognised by the policies under section 4.4.2 which outline that spiritual and cultural concepts are recognised as key issues in water management.

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

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

It is considered that the PPC aligns with many aspects of the IMP. The PPC includes site-specific Precinct Provisions to ensure that all future development is undertaken in accordance with the Stormwater Management Plan, and that wastewater infrastructure is provided for, and waterways are both protected and enhanced through regenerative planting.

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

The PPC through its bespoke Precinct Provisions seeks to incorporate principles of sustainability through the pedestrian and cycle links to future open space and the appropriate stormwater management. All riparian areas will be protected by setbacks and extensive native planting undertaken to support the mauri of the water bodies on the PPC land and the surrounds. The

PPC land is also located close to major transport links and public transport to provide access to a wider range of services in the surrounding area.

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

11.5 Economic Effects

An Economic Assessment has been prepared by Insight Economics to support the PPC and is provided in **Appendix J**. The report includes a review of the current state of the industrial land market in the north-west, outlines how the PPC directly responds to the undersupplied market and the wider economic impacts of the PPC for the north-west and wider Auckland region.

The assessment outlines that the demand for suitable land to accommodate light industrial activity in the north-west is strong. However, there is an historic undersupply of suitable land available. This undersupply has been further exacerbated by the intensification of centrally located land driving land values higher and increasing pressure through more valuable land uses. In addition, increased costs, such as higher interest rates and rent increases, have also caused smaller industrial units to be developed over larger industrial units more suited to land-extensive activities; further straining the availability of suitable industrial land for land-extensive industrial activities in the north-west.

As detailed in Insight's assessment of the JLL Logistics & Industrial study into the availability of land in the north-west, only 104 ha of LIZ land has become available across Westgate and Hobsonville since 2016, of which less than 33 ha remains available and only 20 ha of the remaining vacant zoned land is deemed genuinely available for development. This equates to less than two years supply of vacant, developable land remaining. Insight has therefore concluded that there is insufficient industrial zoned land to meet the current demand and this has resulted in a pressing need for additional greenfield land in the north-west area for industrial purposes.

The economic assessment goes on to demonstrate that the proposed rezoning of the PPC land is the most suitable way to meet the identified demand for industrial land. The following summarises the rationale and economic benefits of the PPC outlined in the economic assessment:

- As discussed above, the PPC will enable 36 ha of developable land to be brought to market and will provide a much-needed boost in industrial land supply. In particular, the extent and shape of land within the PPC land enable large industrial lots to be provided.
- The PPC land is located in a strategic location within close proximity to key transport routes, existing workforce, and other industrial land, has a predominantly flat topography suited to industrial activities, and is suitably located in regard to existing residential activities.
- The PPC is located within close-proximity of existing urban areas, such as Whenuapai township, Hobsonville, Westgate and three Special Housing Areas, and provides a spatial match between household growth and employment, whilst also reducing commute times and distances.
- The infrastructure and buildings enabled by the rezoning will have significant one-off and on-going economic impacts on GDP, jobs and wages and will enable businesses to establish onsite, generating further ongoing economic impacts.
- The PPC could generate full time employment for 1,110 people, over \$77.5 million in salaries/wages and generate an overall annual output of more than \$395 million to support not only the north-west but the wider Auckland region.

It is considered that the economic assessment undertaken by Insight Economics has sufficiently shown that there is a pressing need for additional LIZ land in the north-west, in order to meet existing and future demand. The PPC directly acknowledges and responds to this need and is consistent with the long-term planning vision for the PPC land. It is therefore considered that the PPC provides for numerous positive economic benefits and is supportable on economic grounds.

11.6 Flooding Effects

A comprehensive flood assessment and flood hazard risk assessment of the PPC land has been undertaken by Cato Bolam and is provided in **Appendix K**. The report assesses the existing flood effects and the flood hazard risk associated with the PPC and future development on the PPC land. The report also provides mitigation measures for the flood management of the PPC land. Please refer to the report for details.

A peer review of the stormwater management and flooding approach proposed by Cato Bolam has also been undertaken by Phil Jaggard of MPS Limited and is provided in **Appendix M**. MPS confirms and supports the stormwater management and flooding approach taken by the PPC.

Cato Bolam undertook flood modelling across the PPC land to assess the flooding effects on the downstream environment and neighbouring properties. Both a pre-development and post-development flood analysis was undertaken. The flood assessment results showed that the flood extent resulting from the proposed change in zoning and the subsequent future development

are generally contained within the stream network and riparian areas. The future and existing roads, future accessways and channels can be utilised to manage and convey the 1% AEP overland flow to the stream network across the PPC land. The results demonstrated that the difference in flood extent between the pre and post development of the PPC land is not significant, with a 3.8°C climate change increase and maximum probable development (MPD) of 90% impervious area accounted for.

Furthermore, Cato Bolam outlines that, given the location of the PPC land within the lower half of the catchment, the risk generated by the 1% AEP flow from the PPC will be negligible to minor on the surrounding environment. The PPC land's location at the lower end of the catchment means that mitigation may worsen flood risk effects by aligning peak flows with that of the upstream catchment and, therefore, mitigation for the 1% AEP flows from the PPC is not recommended. It is considered that any flood related effects can be effectively managed and provided for without detrimental effects to the neighbouring and downstream properties, as well as the wider downstream environment as detailed below by Cato Bolam:

“A public and a private bridge at the unnamed stream crossings within PCA1 shall be designed and constructed for access to the future lots. A new culvert shall be constructed to convey the water above the maximum water level in the existing wetland within 96 Trig Road to facilitate access to the northern section of this property. The proposed plan change will not create further flood risk or exacerbate the existing flood risk on neighbouring properties and downstream environment”

The flooding assessment includes a detailed analysis of the flooding effects generated by the existing box culvert crossing on Brigham Creek Road directly to the east of the PPC land. Cato Bolam identified that there is pre-existing flooding along Brigham Creek Road when the box culvert is half blocked (50% capacity) and this generates overtopping on to the Brigham Creek Road carriageway of a maximum of approx. 0.52 m. In contrast, if the box culvert operated without blockage (100% capacity), it would convey flows without overtopping on to Brigham Creek Road.

When considering the MPD for the PPC land and the impact this would have on the identified pre-existing flooding, the flood depth overtopping Brigham Creek Road is calculated to increase by 20mm; a total depth of 0.54m when considering the existing flooding conditions. Cato Bolam considers that the additional 0.05 to 0.15m change in flood levels as a result of the PPC is considered to be negligible as summarised below:

“The flood risk assessment at Brigham Creek Road box culvert crossing suggested that there are no flood effects from the PCA if the culvert is fully operational during a 1% AEP storm event. When a 50% blockage is considered, the flood depth will reach maximum

levels of 0.52m and 0.54m in the predevelopment and post-development (PCA fully developed) scenarios, respectively. It is calculated that the flood depth overtopping Brigham Creek Road when the culvert is considered 50% blocked will increase by 0.02m.

It is calculated that the flood depth overtopping Brigham Creek Road when the culvert is considered 50% blocked will increase by 0.02m. The effect of this increase is less than minor.”

In the event that overtopping occurs, to assist in mitigating the risk posed to drivers and pedestrians on Brigham Creek Road, flood depth markers are proposed to be installed. This will assist road users in identifying flood risk in the unlikely event that it becomes blocked, and flood water overtops Brigham Creek Road.

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

11.7 Infrastructure Effects

Information and assessments relating to stormwater, water supply, wastewater capacity and other services has been provided by Cato Bolam and attached at **Appendix N & O**. The following assessment is therefore a summary of what are considered to be the key findings of the assessment and how they have been incorporated into the Precinct provisions.

It is also noted that Cato Bolam has split the PPC land into two areas or catchments, when describing the infrastructure proposed for the PPC. Plan Change Area 1 ('**PCA1**') refers to the east of Trig Road and Plan Change Area 2 ('**PCA2**') refers to the west of Trig Road (as shown by **Figure 33** below).



Figure 33 - Site areas

11.7.1 Stormwater

As discussed previously in this report, the PPC land is currently not serviced by any stormwater infrastructure and the PPC land naturally drains to the existing gullies and streams. Several circular culverts are located through the PPC land and an existing box culvert under Brigham Creek Road. To support the proposed rezoning of the PPC land, a SMP has been prepared by Cato Bolam and is provided in **Appendix N**.

The SMP has used the Whenuapai 3 Precinct Stormwater Management Plan ('W3SMP') prepared to support the WSP as the basis for the proposed stormwater management of the PPC land and has been modified to address site specific requirements and to ensure consistency with the NDC Schedule 4. Schedule 4 specifically requires the following matters to be addressed:

- Water Quality
- Stream Hydrology
- Flooding: 10% AEP (property/pipe capacity); and
- Flooding: 1% AEP (building)

The SMP identifies that stormwater will be managed and guided on site by the following principles:

- Retention of 5 mm of rainfall for all impervious areas.
- Detention for the difference between the pre-development and post-development runoff volumes for a 95th percentile storm.
- Treatment systems for impervious area, such as roofing (excluding roofing constructed from inert materials), paving and roading.

- The primary stormwater networks shall accommodate runoff from a 10% AEP storm event.
- Existing and proposed overland flow paths shall be managed or re-routed to avoid detrimental effects to neighbouring properties and the downstream environment.

A range of water quality treatment options were considered for the PPC. Cato Bolam determined that tanks would achieve the best stormwater management for the future buildings/lots. Bioretention raingardens and swales are proposed to form the bulk of the management devices for the proposed roads, as well as dry treatment/dry detention basins. The construction of wetlands/ponds was determined to not be appropriate due to the proximity of RNZAF Base Auckland and the potential of bird strike issues. The stormwater management devices proposed include the following:

- Bioretention treatment devices
- Erosion protection at outlets
- Gross pollutant traps or screens at inlets
- Provision of riparian margins/planting
- Protection and enhancement of existing streams
- Erosion and sediment controls during construction activities

The above stormwater management devices will also assist in mitigating the increased impervious surfaces on the PPC land (from the proposed roads) on the hydrology of the existing stream network and will provide for the required detention for the difference between the pre-development and post-development runoff volumes from a 95th percentile storm.

The recommendations from Te Kawerau ā Maki CIA prepared for the previous Fast-track consent application have been incorporated into the SMP approach and included where possible in the preparation of the plan. The CIA highlights that the stream is a key cultural feature of the PPC land and should be protected in accordance with Kaitiakitanga values. This has been provided for as part of the SMP approach and throughout the PPC.

Overall, it is considered that an integrated stormwater management approach that considers the existing features of the PPC land and the surrounding environment has been proposed and will ensure that the PPC protects the receiving environment. The proposed stormwater strategy meets the requirements for 'greenfield' development under the NDC and will appropriately avoid, manage, or mitigate adverse effects.

11.7.2 Wastewater

The surrounding area is currently serviced by the existing Whenuapai Pump Station located to the east of Waiarohia stream off Brigham Creek Road. In addition, an existing 450PE gravity line traverses the southern boundary of the PPC land before discharging to the Whenuapai Pump

Station. The proposed wastewater infrastructure to support the PPC is outlined in the Infrastructure Report prepared by Cato Bolam and has been designed based on extensive consultation with Watercare.

Cato Bolam, in consultation with Watercare, has identified that the existing Whenuapai Pump Station has potential capacity constraints. However, Watercare’s Whenuapai and Redhills wastewater project (Package 2) will upgrade the wastewater network to service the anticipated growth in the north-west. The upgrades are anticipated to be completed in 2028, consistent with the timing of the PPC, and will address any capacity constraints to ensure the PPC and wider area can be sufficiently serviced for wastewater.

With regard to the PPC land, Cato Bolam analysis has determined that suitable wastewater infrastructure can be provided for the proposed rezoning. For PCA1, in consultation with Watercare, a new public pump station at the north-eastern corner of the PPC land is proposed. A new public pump station was determined to be the preferred option to avoid extremely deep lines. The proposed public pump station will service the northern and eastern sections of PCA1, with the southern and western sections of PCA1 being serviced by proposed gravity lines off the existing 450PE gravity line that traverses the southern boundary of the PPC land.

Regarding PCA2, it is proposed to have private pump stations to service future development. Private rising mains will discharge flows to the existing 400 PE gravity line via a new satellite manhole.

The final reticulated networks needed to service the PPC can be suitably managed and designed via the resource consenting process and the existing AUP framework. It is considered that Cato Bolam has demonstrated that the PPC can be sufficiently serviced for wastewater and that the necessary infrastructure and upgrades to existing infrastructure is provided for as part of the PPC or by Watercare. On this basis, it is considered that the proposed wastewater infrastructure is sufficient to allow for the PPC land to be rezoned and will not generate any significant wastewater capacity effects.

11.7.3 Water supply

Existing potable water connections are located within both Brigham Creek Road and Trig Road. An existing line also extends into the PPC land and provides connections to 69 and 71 Trig Road. To service the PPC, Cato Bolam has demonstrated that the extension of the existing watermain network is achievable and will provide sufficient capacity for the proposed rezoning.

To service PCA1, an extension of the watermain network will be undertaken to link the watermains between Brigham Creek Road and Trig Road. The existing 150 mm pipe within Brigham Creek Road will be abandoned and superseded by the proposed pipelines that will

extend from the existing 315PE line within Brigham Creek Road. The water supply for PCA2 is proposed to be via an extension from the existing 150mm pipe in Trig Road.

Watercare has identified a section of 150 mm watermain near the intersection of Brigham Creek Road and Hobsonville Road that acts as a network constraint. However, the upgrading of this section to a 355 mm pipe will alleviate this issue.

A looped watermain network will be required in the proposed internal roads to service future development and will be designed and assessed at the resource consent stage. Firefighting provisions can be achieved throughout the proposed network. Furthermore, a Hydraulic Assessment has been prepared by Watershed Engineering Ltd. The assessment demonstrates that sufficient water supply can be provided to support the proposed rezoning of the PPC land.

Overall, it is concluded that any adverse effects resulting from the supply of water to the PPC land would be able to be avoided, remedied, or mitigated.

11.7.4 Earthworks Effects

As noted previously, bulk earthworks have been completed or are occurring on much of the PPC land under a range of previously approved bulk earthwork consents. Bulk earthworks have been progressed at 69 and 71 Trig Road, and 151 Brigham Creek Road under resource consents LUC60350837 and LUC60376543 respectively. Additional bulk earthworks are also progressing at 94 Trig Road under resource consent BUN60395603 and at 73 Trig Road under BUN60410316.

As outlined in the Infrastructure Report prepared by Cato Bolam in **Appendix O**, further earthworks will be required to facilitate the PPC. These additional works will be required to form the roads and prepare platforms for development. While the detailed earthworks design for future site development will be addressed at the resource consent stage, the key earthwork principles outlined below will apply to any future development:

- Proposed earthworks will be designed to minimise cut and fill volumes wherever possible.
- All future land modification will retain the 10 m riparian margin for streams and wetlands and will minimise adverse impacts on all ecological features.
- All future works will be supervised by a suitably qualified geotechnical engineer to ensure all works are completed in accordance with geotechnical recommendations.

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

11.7.5 Infrastructure Conclusion

Overall, the Infrastructure Report concludes with the following:

- *“Further earthworks will be required to form the roads and prepare building platforms. Developments will be designed to practically minimize the cut and fill volumes.*
- *Proposed land modification will retain the intermittent streams and natural wetlands wherever practicable and minimize adverse impacts on these features.*
- *Modest land modifications and overland flow paths can eliminate the existing low-lying areas shown as Flood Plain and Flood Prone in the property at 141 Brigham Creek Road.*
- *Erosion and sediment controls will be employed during construction to minimize the potential adverse impacts.*
- *Wastewater services can be provided by extension from the existing manholes. A new public pump station and rising main can be installed to avoid the use of deep lines and can be connected to the existing gravity line.*
- *The existing water network can be extended to supply potable water and provide firefighting for the development. An existing section of 150mm AC watermain near the intersection of Brigham Creek Road and Hobsonville road is considered a constraint and will need to be upgraded to 355mm PE to alleviate the constraint.*
- *Utility services are available within the road reserve and will be extended to service the development.*

Considering the above, the existing and proposed infrastructure is adequate to allow for the PCA to be rezoned.”

Overall, it is therefore concluded that sufficient servicing is available to support the PPC, with the design details being assessed and required as part of future resource consent applications.

11.8 Land Stability and Geotechnical Effects

A geotechnical investigation report has been prepared by GMW Geosciences to support the PPC and is provided in **Appendix P**. The report assesses the feasibility of the PPC land for the proposed rezoning in regard to stability, based on the underlying characteristics and findings of the site investigations.

The geotechnical assessment included investigating the subsurface ground conditions, which involved a visual appraisal of the PPC land and physical sampling by hand-augured boreholes and associated subsequent testing of the soil samples. A desktop study of the geological maps and review/summary of any previous reporting relating to the PPC land complemented the physical investigation.

Overall, the investigations conducted across the PPC land found that the land is generally suitable for development.

Where any mitigation is required to ensure the land is safe for development, this has been outlined in the comprehensive geohazard assessment table within the report. The findings of the assessment are adopted by the applicant, and any mitigation works required will be undertaken at the resource consent stage.

Therefore, it is our opinion that, based on the above, the PPC land is suitable for the creation of stable building platforms, associated infrastructure, and future subdivision, and consequently any adverse effects are considered to be sufficiently avoided, managed, or mitigated.

11.9 Contamination Effects

A range of preliminary and detailed site investigations have been undertaken across the PPC land (refer to Site Investigation Report in **Appendix Q**). In summary, the majority of the PPC area is not subject to any contamination related activities. The site-specific investigations for 151 and 155-157 Brigham Creek Road and 69 and 71 Trig Road did identify HAIL activities. However, the affected areas have been adequately remediated under the existing approved earthwork consents. Therefore, any adverse contamination effects have been sufficiently mitigated and will not impact the PPC.

11.10 Archaeological Effects

An archaeological assessment has been undertaken by Clough & Associates Ltd and is provided in **Appendix R**. The report outlines in detail the history of the PPC land and the wider Whenuapai area. Field surveys and an archaeological desktop analysis of the PPC land were undertaken to determine whether any archaeological sites are present within the PPC area. The investigations led to the following conclusions:

“The background historical research has indicated that the various land blocks in the proposed Whenuapai Business Park Plan Change Area likely remained as largely unimproved land during the 19th century with some timber felling or gum digging possibly taking place and there is no record of any pre-1900 homesteads being present. As well, no archaeological sites have previously been recorded in the proposed Whenuapai Business Park Plan Change Area and none were identified during analysis

carried out for this assessment. Also, while there is traditional historical evidence of Māori settlement and occupation around the wider upper Waitemātā Harbour area in the past, no archaeological sites have been identified within the Whenuapai Business Park Plan Change Area.”

Based on the above, it was therefore concluded that the PPC will have no known effects on archaeological values as no archaeological sites have been previously recorded or were discovered in the PPC area. In the highly unlikely event that subsurface remains are discovered during future development, the Accidental Discovery Protocols under the AUP would provide for this situation and all works would be required to cease within 20m of the discovery. The report also concluded that an authority under the Heritage New Zealand Pouhere Taonga Act 2014 will not be required for the PPC as no known archaeological sites are present.

It is therefore considered that the PPC will have no known effects on archaeological values as no archaeological sites have been identified and the potential for any unidentified subsurface remains to be discovered is considered to be very low. In the event that discoveries are made, the effects can be appropriately managed and mitigated through the Accidental Discovery Protocols under the AUP and the relevant provisions of the New Zealand Pouhere Taonga Act 2014.

11.11 Urban Design Effects

Ian Munro has been commissioned by Neil Construction Limited to prepare an Urban Design assessment, which is provided in **Appendix S**. The report provides an assessment of the potential urban design related effects for the PPC land under the PPC and the proposed provisions. The urban design report explores the proposal for rezoning the PPC land from FUZ to LIZ, the effect of the proposed Precinct provisions, and what effect these changes may have on the existing area.

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

“In terms of any adverse urban design effects, I consider the proposal would not result in any adverse urban design effects that are remarkable or out of the ordinary for new green field (light industry) development. Overall, adverse effects associated with the location, integration, and operation of light industrial activities on the Site will be appropriate and in line with what is typical of the Light Industry zone elsewhere in Auckland.”

The assessment goes on to expand that the PPC land is strategically well-located and is very suitable for the proposed LIZ, particularly when considering its compatibility with the on-going

operations of the Whenuapai Airbase. Furthermore, Mr Munro outlines the history of the area and how the land has been earmarked for business/industrial use for a considerable period, further supporting his conclusions that the PPC represents the most appropriate urban design outcome for the PPC land. While the assessment does acknowledge that the PPC will result in a substantial change to the character of the predominantly semi-rural/semi-lifestyle state of the neighbourhood, it is Mr Munro’s opinion that the proposed industrial use would not be inappropriately adverse in the same way it has been appropriate to rezone similar-character land elsewhere in Whenuapai. It is therefore concluded by the urban design assessment that the proposed LIZ is the most appropriate outcome for the PPC land and is supported from an urban design perspective.

Mr Munro also notes a number of contributing factors in terms of the proposed Precinct plan and provisions which further supports the appropriateness of the PPC from an urban design perspective. The urban design assessment notes the following:

“The proposal includes a Precinct Plan that demonstrates how an appropriate land use quality will be achieved. This includes an indicative high-level urban structure (blocks and roads), protection of ecologically sensitive areas, provision for specific pedestrian and cyclist facilities over and above what is normally expected as part of new public roads, and landscaped amenity along new streets. Accepting that the urban design quality of industrial zones can be reasonably expected to fall short of a high-density urban centre or premium residential neighbourhood, the proposal will exceed the minimum outcomes generally enabled within the Light Industry zone.”

The assessment finds that the Precinct plan and associated provisions proposed will be successful at avoiding, remedying, or mitigating potential urban design effects and will contribute to achieving a quality compact urban form for Whenuapai/north-west Auckland. Mr Munro considers that the Precinct provisions will achieve a well-connected and integrated built form via the indicative roading proposed and upgrades to existing infrastructure. His assessment is expanded on further by the below:

“Because the Council has already prepared a structure plan it has not been considered necessary to re-consider the AUP: OP Appendix 1 matters relevant to structure plans. The proposed Precinct Plan includes a high-level (indicative) road network and provides for other relevant site constraints including streams and their margins, high noise contours, future intersection types, and open space buffers. These are sufficient to provide a future land use management framework that will manage all relevant built form (subdivision and layout-related) effects.”

Mr Munro considers that the Precinct plan and associated provisions will be sufficient in managing the future land use and associated built form and any future visual or built form

related effects do not require any particular management over and above the methods outlined in the Precinct.

The assessment concludes that the proposed Precinct plan and associated provisions are sufficient in providing a future land use management framework that will manage all relevant effects that arise from the proposed LIZ and future development.

11.12 Character and Visual Amenity Effects

A Landscape Visual Assessment (LVA) has been prepared by Sola Landscape Architects and is provided in **Appendix T**. The report provides an assessment of the likely landscape and visual effects of the proposed development on the PPC land. The assessment considers the existing character of the PPC land and the surrounding environment, identifies the key landscape and visual features of the PPC land, and describes the visual and landscape effects of the proposal on to the surrounding environment.

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

“Although the site exhibits some level of amenity, there is nothing remarkable about its landscape character, and it has no particular significant or notable landscape features or characteristics. Consequently, most of the site, excluding the wetlands and riparian areas, possesses the capability to readily accommodate more intensive urban development, particularly due to the easy contour, the proximity and influence of urban development locally, the proximity to the existing road network and the ability for open space buffers to appropriately manage the interface with adjacent areas.”

As highlighted above, it is considered that the PPC land does not possess any unique or significant landscape characters or features. The following assessment regarding the surrounding local area is also noted:

“It is also important to note that although the site and local area currently exhibit semi-rural characteristics, neither display a high degree of ‘ruralness’ due to a combination of the size of landholdings, the patterns of rural-residential settlement, existing infrastructure, existing large-scale earthworks and proximity to the commercial, light industry and residential urbanised area of Whenuapai. Consequently, the Defence Force land use and subsequent designations on the surrounding land restricts distinctly residential urbanisation.”

It is therefore considered that the PPC land is located in an area that has begun the shift away from a rural character to one of a more urban character. This is evident from the modification that has already occurred on the PPC land and the development of the wider surrounding area. Sola expands on this by outlining that whilst the PPC would result in a change in landscape

character, it would ensure a suitable level of amenity, albeit of an urban rather than a semi-rural character, is achieved. A suitable level of amenity will be achieved through the LIZ provisions and the proposed bespoke precinct provisions, which go above and beyond the requirements of the LIZ. The precinct provisions require a number of positive landscape outcomes, such as the front yard setback landscaping, the open space boundary buffer planting, and the extensive riparian planting. The proposed precinct objectives and policies also require the ecological values of the PPC land to be protected from development, further safeguarding the amenity of the PPC land.

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

- Adjoining properties
- Surrounding road network
- Wider surrounding area

In regard to the wider surrounding network, Sola considers that whilst development enabled by the proposal would be visible from parts of the wider surrounding area, the visual effects are low and entirely acceptable within the context of the planned future urban environment.

Whilst it is noted that the properties immediately adjoining the PPC land would be most affected by development enabled by the PPC, the overall visual effects would be low-moderate and are anticipated via the zoning of the PPC land for future development. Effects will be appropriately mitigated by the proposed precinct provisions, such as the open space buffer along the interface with future Council land, as well as existing vegetation on the neighbouring properties filtering or partially screening future development. Furthermore, although future development would constitute a distinctive change, it is not a type of change which is unexpected in the area and the quality of development required by the precinct provisions will ensure that a suitable level of amenity is achieved for the adjoining properties.

Similarly, when the viewed from the surrounding road network, future development enabled by the PPC would be minimized by the green network along the stream corridors, street tree planting and planting associated with the open space buffers and front yard setbacks to ensure development integrates with the landscape. Additionally, the general road users are unlikely to be particularly sensitive to future development as they would only have fleeting views of the PPC land while moving through the area, in combination to future development being viewed in the context of the surrounding RNZAF Base and the existing light industrial area along Hobsonville Road. Therefore, the visual effects from the surrounding road network would be low-moderate and acceptable.

Furthermore, it is also considered that a range of positive landscape effects arise from the PPC, such as enhancement of the on-site stream network, extensive native planting across the PPC land (including the planting of riparian areas), open space buffers to future Council park land and front yard landscaping buffers. These aspects will assist in maintaining a suitable level of amenity on the PPC land.

Sola concludes with the following:

“While the proposed development would result in a significant visual change from the site’s current open semi-rural state to one with urban characteristics, particularly for some of the immediate neighbours, such visual change is anticipated and is in accordance with the key planning initiatives for the area within the FULSS, FDS, WSP and AUP. With this type of change, effects to the bio-physical landscape and in turn landscape character and visual amenity effects are anticipated and for the most part unavoidable.

Despite the relatively low landscape values, the development would initially generate landscape and visual effects of low to moderate and some significance. These, however, are inevitable with urban development in a predominantly semi-rural area at the start of a process of urbanisation. In addition, the visual effects of the development of the site apparent from the early stages would decrease over time (5-7 years) as proposed landscape initiatives become established and the other portions of the FUZ are developed.

In conclusion, the proposed PPC would fulfil the need for light industrial urban intensification and provide an opportunity for an innovative and environmentally sustainable urban development. The proposal would be largely consistent with regional growth strategies for the area and would result in a high-quality urban development with a range of positive landscape and environmental outcomes.”

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

11.13 Reverse Sensitivity Effects

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

To ensure any potential effects are adequately managed, the applicant has engaged with NZDF and incorporated Precinct provisions that seek to address potential impacts on the day-to-day operations of RNZAF Base Auckland. The proposed provisions have been prepared following

consultation with NZDF and are considered to be satisfactory to manage any potential effects on RNZAF Base Auckland. These provisions include:

- Restrictions on planting, such as canopy trees, that may increase bird presence in the area.
- Further control over the establishment of activities sensitive to aircraft noise on the PPC land, such as worker’s accommodation and care centres.
- Avoidance of stormwater ponds and constructed wetlands that may increase bird presence in the area.
- The roofs of future buildings are designed to prevent the ponding of water and the potential for birds to roost or nest. Netting and/or spikes to be used on roofing where the roof cannot be designed to meet this.
- External building materials (including roofs) to not exceed a reflectivity of 30% white light where located more than 10m above ground level.
- Prior to the installation of external cladding/roofing greater than 10m in height, the material specifications to be provided to the satisfaction of both Auckland Council and NZDF.
- No complaints covenants to be registered on all future lots when subdivision occurs.

Based on the above, it is considered that the PPC has sufficiently addressed and will mitigate any adverse reverse sensitivity effects on to RNZAF Base Auckland.

11.14 Overall Environmental Effects Conclusion

Overall, it is considered that any adverse effects generated by the proposed development enabled by the PPC will be minor and satisfactorily mitigated through the proposed Precinct provisions. In addition, it is considered that there will be numerous positive effects arising from the development enabled.

12.0 Consultation

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

- Mana Whenua
- New Zealand Defence Force
- Auckland Council
- Auckland Transport
- Healthy Waters
- Watercare
- Te Tupu Ngatāhi Supporting Growth
- Neighbouring land owners

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

13.0 Conclusion

The establishment of the Whenuapai Business Park Precinct on the PPC land is considered to be the most appropriate means to achieve the purpose of the RMA. It is the best available option to enable and facilitate the development of a strategically located site in accordance with the vision and outcomes sought under key strategic documents, while ensuring that existing site features are enhanced and surrounding existing uses are protected.

The PPC is considered to be consistent with the high order statutory plans, the Auckland Plan 2050, the FDS, and the WSP, as well as the RPS. In addition, the s32 analysis confirms that the proposed Precinct approach and SMAF control is appropriate for the PPC land. Through that evaluation it has been determined that enabling industrial development through the proposed zoning in combination with bespoke Precinct provisions is more appropriate than the status quo or solely Light Industry zoning.

The proposal is consistent with the objectives and policies of the LIZ, and the objectives and policies from the Natural Resources, Transportation, Environmental Risk and Subdivision sections of the AUP.

A comprehensive assessment of environmental effects potentially generated by development enabled by the PPC has been carried out. Any adverse effects generated by the proposed development that would be enabled will be minor and satisfactorily mitigated, and there will be

significant positive social, cultural and environmental effects from the form of development that would be enabled.

The assessments demonstrate that the proposed new objectives of the Whenuapai Business Park Precinct are the most appropriate way to achieve the purpose of the RMA and to contribute to the achievement of the objectives of the RPS, and that the proposed new policies and rules of the Whenuapai Business Park Precinct will efficiently and effectively achieve the objectives of the LIZ and the Precinct.

Overall, it is considered that the PPC is the most appropriate way of achieving the purpose of the RMA and it is therefore recommended for that the PPC be accepted for processing under Schedule 1 of the RMA. The PPC will enable the efficient use of the PPC land, while at the same time providing appropriate controls to ensure that the interface between the PPC land and surrounding area is appropriately managed and the outcomes sought for the PPC land are provided for.

PPC assessment undertaken by:

Philip Brown
Director
Campbell Brown Planning Limited

Michelle Kemp
Principal Planner
Campbell Brown Planning Limited

Isobel Lee
Intermediate Planner
Campbell Brown Planning Limited

(For and on behalf of Neil Construction Limited)



Campbell Brown Planning Limited

Level 2, 46 Brown Street, Ponsonby | PO Box 147001, Auckland 1144

Ph 09 378 4936 | info@campbellbrown.co.nz | www.campbellbrown.co.nz