

23 July 2024

Auckland Council
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Attention: Jess Romhany
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Dear Jess

Subject: Hobsonville Grove Precinct – Response to Clause 23 requests
Project number/HG ref: A2212330.02

This letter responds to the matters raised by Council’s Urban Design Specialist (Rebecca Skidmore). A full response to the clause 23 letter will be provided to Council by 2 August 2024.

Response to U1

The urban design approach gives effect to the regionally significant issues and policy direction set out in Part B of the AUP(OP).

The issues and high-level policy direction were important considerations applied to frame the analysis of opportunities and constraints. The specific Hobsonville Grove Precinct provisions have been proposed where there is a regional issue that needs addressing that cannot sufficiently be left to the existing AUP(OP) nationwide and zone objectives and policies.

Our full response to the clause 23 matters will include an updated AEE that addresses all chapters of Part B in a more comprehensive way, as requested in P8. The below table is a summary of our assessment of the PPC against Part B, as it relates to urban design matters.

Issue of regional significance	Comments
Urban growth and form	<p>The PPC is generally consistent with Part B2 of the AUP(OP), for the following reasons:</p> <ul style="list-style-type: none">a) The PPC will accommodate growth within an area that has long been earmarked for urban development. The PPC involves land within the Rural Urban Boundary (RUB).b) The PPC will make efficient use of existing trunk infrastructure and will not require significant upgrades to the transportation network.c) While Block 2 is not located on an existing rapid transit route or adjacent to a town centre, the PPC will intensify land within walking

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Issue of regional significance	Comments
	<p>distance of a regular bus route on Hobsonville Road and a future bus route (Spedding Road NOR). The PPC will also intensify land close to a proposed local commercial centre. (Reasons for the THAB zone being adopted in Block 2 is provided in response to U5).</p> <ul style="list-style-type: none"> d) Land furthest from the bus route on Hobsonville Road and the small-scale neighbourhood commercial centre will be zoned for lower density residential land use. e) The PPC will provide for a range of housing typologies and employment opportunities. This will also increase the supply of affordable housing. f) The PPC will provide connections to adjacent land and achieve a high level of connectivity and amenity for pedestrians and cyclists. g) Urbanisation sought by the PPC will not adversely affect natural and physical resources that have been scheduled in the AUP(OP), or any features that are of significance to mana whenua. h) The industrial zoning of Block 1 will promote economic development and the land can be developed in a manner that manages conflict between adjacent residential activities. i) Retail activities will be enabled at a scale that aligns with the recommendations of the Economics Assessment that was supplied with the PPC request. The scale of retail activity enabled can support the day-to-day needs of the local residential community, without affecting the role and function of other commercial centres. j) The retail activities will be located on a future collector route that supports the role of the centre.
Infrastructure, transport and energy	<p>The PPC will make efficient use of existing trunk infrastructure and will not require significant upgrades to the transportation network.</p> <p>The proposed precinct provisions and the existing provisions of Parts E38 (Subdivision) and E27 (Transportation) will ensure that the PPC land will be developed in a manner that integrates with the surrounding road network. The alignment of a collector road and a local road over the Rawiri Stream have been shown on the precinct plan. The location and alignment of these indicative roads have been determined following expert analysis by the urban design specialist and transportation specialist.</p> <p>The proposal will achieve effective pedestrian and cycling connections (see response to U4).</p> <p>The Neighbourhood Retail Opportunity overlay will promote a walkable neighbourhood concept and reduce vehicle trips.</p>
Built heritage and character	<p>Not applicable – there are no identified sites of heritage significance or special character within the PPC land area.</p>
Natural heritage	<p>The PPC area does not contain any outstanding natural features or landscapes that must be protected for subdivision, use and development. The PPC will not affect the Waitakere Ranges Heritage Area.</p> <p>Urban development of the PPC land will not adversely affect any viewshafts to volcanic cones or other outstanding natural features or landscapes.</p>

Issue of regional significance	Comments
	There are no notable trees to avoid or incorporate into the subdivision and development of PPC land.
Issues of significance to mana whenua	<p>Mana whenua engagement is ongoing. Our full response to the clause 23 requests will include the outcomes of this engagement.</p> <p>To the best of our knowledge, there are no wāhi tapu and historic places within the PPC area that would make the land unsuitable for urban development.</p>
Natural resources	Our full response to the clause 23 requests will confirm that the PPC land area does not contain any freshwater features (wetlands or streams) and that the site does not contain any significant indigenous vegetation or indigenous habitat values.
The coastal environment	Stormwater will be appropriately managed to avoid, remedy and mitigate adverse effects on the downstream coastal environment.
The rural environment	Not applicable – the land has been zoned ‘Future Urban’ in the AUP(OP). The PPC land is not adjacent to rurally zoned land.
Environmental risk	<p>Specialist reports submitted with the PPC request confirm that there are no identified hazards or signs of soil contamination that would prevent the land from being developed for urban purposes.</p> <p>Downstream flooding concerns raised by Healthy Waters in the clause 23 letter will be addressed in our full response.</p>

Response to U2

Below is an assessment of the PPC against the Development and Design Principles outlined in section 8.1 of the Whenuapai Structure Plan (WSP), as they are to urban design matters. While the Urban Design Statement did not specifically address each of these matters individually, the urban design statement was clearly drafted to respond to the opportunities and constraints that were identified in the WSP.

Development and Design Principle	Analysis
Create a well-designed, sustainable quality compact form with a strong sense of space.	The THAB and MHU zones will lead to a well-designed and compact urban form.
Recognise the presence and importance of Whenuapai Airbase and restricting residential development in areas affected by aircraft noise.	Not applicable.
Recognise the presence and importance of large, long-standing industries that are expected to remain in operation for the foreseeable future.	Block 2 will be separated from existing industrial land uses by the Rawiri Stream and the associated riparian margins. This separation distance will mitigate the potential for reverse sensitivity issues to arise.

Development and Design Principle	Analysis
<p>Capitalise on the existing coastline, waterways, landscape, amenity, to create a strong green and coastal public open space.</p>	<p>There are no watercourses (wetlands and streams) within Blocks 1 and 2. Land subject to the PPC is not adjacent to a coastal area or any watercourses.</p> <p>The PPC will involve rezoning 84 Hobsonville Road from Open Space – Informal Recreation to Business – Light Industrial. This land does not significantly contribute to the coastal or freshwater landscape. (This matter relates to P1 and will be addressed in our full response to the clause 23 letter).</p> <p>The Hobsonville Grove Precinct includes provisions that will encourage walking and cycling connections to be made to existing or proposed paths on land adjacent to the PPC land (e.g. riparian margin of the Rawiri Stream).</p>
<p>Expand the existing Whenuapai centres and develop complementary smaller centres.</p>	<p>A small retail centre is proposed within Block 2 to provide for the day-to-day needs of the local population.</p>
<p>Improve existing community facilities and new community facilities in centre.</p>	<p>There are no existing community facilities within the PPC area, aside from the land owned by Auckland Council at 84 Hobsonville Road, which is currently zoned Open Space – Informal Recreation under the AUP(OP). However, Council has agreed to dispose of this land. (This matter will be addressed in detail in our response to P1).</p> <p>No changes will be made to existing AUP(OP) provisions that already provide a consenting pathway for community facilities to be established within the THAB and MHU zones.</p>
<p>Identify existing land owned by the Ministry of Education and private schools currently in operation while expecting that future schools within the proposed residential areas will be needed in future.</p>	<p>Not applicable.</p>
<p>Provide choice of residential densities and future dwelling types throughout the structure plan area.</p>	<p>Housing choice / typologies will be provided for by way of the THAB and MHU zone. This promotes greater variety than if Block 2 were zoned entirely MHU, as when indicated in the WSP.</p>
<p>Concentrate higher density residential areas around centres and where future rapid transit network stops are being proposed.</p>	<p>While Block 2 is not located adjacent to an existing neighbourhood centre or a rapid transit corridor, Block 2 is located within walking distance to Hobsonville Road (an established bus route with proposed active mode facilities). Many bus routes connect to the Western Express (WX1) rapid transit station at Westgate, which provides frequent bus services to the Central Business District (CBD).</p>
<p>Enable low density residential on the coastal edge given its isolated location and the complexity of coastal erosion.</p>	<p>Not applicable.</p>

Development and Design Principle	Analysis
Provide the foundation for the future residential block structure and site orientation to maximise solar gain.	The existing Part E38 - Subdivision provisions of the AUP(OP) can be relied upon to achieve this outcome without including specific requirements within the proposed Hobsonville Grove Precinct.
Deliver local employment opportunities close to residential neighbourhoods and good transport connections.	The PPC will zone land within Block 1 for light industrial purposes. This land will have good transport connections and will be close to existing and future residential areas.
Protect waterways and enable the improvement of water quality and restoration of vegetation and habitat.	This criterion will be addressed in our full response to the clause 23 letter. Our response will include an amended Stormwater Management Plan (SMP), an amended Ecology Report, and an amended Assessment of Environmental Effects (AEE).
Promote water sensitive design throughout the structure plan area, from sitespecific features to infrastructure in the public.	This criterion will be addressed in our full response to the clause 23 letter. Our response will include an amended Stormwater Management Plan (SMP), an amended Ecology Report, and an amended Assessment of Environmental Effects (AEE).
Allow for the efficient provision of infrastructure on a staged basis.	<p>We supplied an Infrastructure Report with the PPC request that confirmed that there is sufficient publicly available reticulated water and wastewater to service Block 1 and most of the development that would be enabled within Block 2. Precinct provisions have been proposed that would prevent Block 2 from being developed until the infrastructure were operational.</p> <p>The Integrated Transportation Assessment demonstrated that development enabled by the PPC would not adversely affect the safe and efficient operation of the public road network.</p>
Develop and maintain a well-connected transport network within Whenuapai and to the wider transport network.	<p>The proposed Hobsonville Grove Precinct provisions will strongly encourage connections to adjacent land held in private ownership. It will fall on adjacent landowners to construct their section of the road.</p> <p>Figure 24 of the Urban Design Statement provides a conceptual masterplan of the wider environment to provide context to the indicative alignment of the collector road in the precinct plan.</p>
Create a safe and well-connected network of open space and reserves.	A park is indicated in the precinct plan. The location of the park is central / accessible to the future residents of the precinct and adjacent land that is also zoned for future urban purposes. The park location is also in general accordance with Parks acquisition requirements, in terms of size and location providing opportunities for connections with the neighbouring Rawiri Stream open space and future green corridor along the Trig Stream.
Enable transport connections along and to the coastline where possible while recognising the sensitivity of the coast to erosion and inundation.	Not applicable.
Provide a safe and well-connected network of streets	Indicative collector roads are shown in the Precinct Plan.

Development and Design Principle	Analysis
that utilises existing roads where possible and enables multi-modal movement within the structure plan area.	The Hobsonville Grove Precinct includes provisions that will encourage walking and cycling connections to be provided within the precinct and to connect with adjacent land.
Provide transport infrastructure and connections that enable increased provision of multi-modal transport for both residential and business neighbourhoods.	<p>The Hobsonville Grove Precinct includes provisions that will encourage walking and cycling connections to be provided within the precinct and to connect with adjacent land.</p> <p>Day-to-day needs of future residents will be met by enabling small-scale retail land use within walking distance of all dwellings enabled by the PPC.</p>
Provide for the sustainable management of taonga (e.g. the importance of protecting the mauri of waterways, recognition of mana whenua culture, traditions, tikanga, place names, artefacts, wāhi tapu and historic places and areas) and how these elements can be incorporated into the structure plan and future plan change process as advanced by Te Kawerau ā Maki and Ngāti Whātua o Kaipara.	<p>Mana whenua engagement is ongoing. Our full response to the clause 23 requests will include the outcomes of this engagement.</p> <p>To the best of our knowledge, there are no wāhi tapu and historic places within the PPC area that would make the land unsuitable for urban development.</p>

Response to U3

Our full response to the Clause 23 request will include an image that overlays the extent of Spedding Road NOR and hypothetical development of Block 2 that is shown in the illustrative masterplan in Figure 23 of the Urban Design Statement. For now, the extent of the NOR in the AUP(OP) planning maps and the illustrative masterplan is shown side-by-side (**Figure 1**), to show that the extent of land needed for the Spedding Road arterial has been considered when determining potential yield and the location of the collector road.



Figure 1: The above images show the effect of the Spedding Road NOR on the potential development capacity of Block 2 and how the development could be incorporated into the proposed arterial road.

There is little certainty when the Spedding Road arterial will be constructed. There is also little certainty on whether the implemented design could provide vehicle access to Block 2, and if so, where that access would be located. This is why the Hobsonville Grove Precinct Plan (I1.10.2) shows an “indicative connection” point at the “indicative” Spedding Road. There is no standard that would require this connection, but there is a proposed policy that encourages a connection to Spedding Road.

Based on current designs and our discussions with Auckland Transport, we understand that there may be potential for Block 2 to be served by a left-in / left-out intersection arrangement at Spedding Road, as it may not be practicable to provide for right-turn movements. The exact location and nature of the intersection would be subject to detailed design and supporting safety assessments and may be affected by the location of stormwater detention ponds that are needed to manage stormwater from Block 2.

There is more flexibility around the potential to connect with active mode facilities within the Spedding Road corridor. Should the Spedding Road corridor not proceed, there is potential for an active mode network to be provided in its place, as shown in the Illustrative Masterplan in the Urban Design Statement (Figure 23). If Spedding Road is constructed in a manner where vehicle access to Block 2 is not possible, this would not prevent walking and cycling connections from being provided alongside nearby water features.

For the above reasons, our full response to the Clause 23 letter will include amended Hobsonville Grove Precinct provisions that:

- a) Requires active mode connections (walking and cycling) to land subject to land affected by the Spedding Road NOR. The exact location of the connection will be confirmed during the resource consent process. Resource consent will be required for a restricted discretionary activity if the connection isn't provided / future proofed, and this would be contrary to the related objectives and policies; and
- b) A vehicle connection to Spedding Road is possible and this is supported by the objectives and policies that were included in the lodged PPC. The Hobsonville Grove Precinct provisions will not be amended to include a standard that requires a public road connection with Spedding Road.

Response to U4

Our full response to the Clause 23 letter will include a map of public active mode trails that exist and are planned in the area. The map will reference the Upper Harbour Greenways Plan (2019).

For now, we draw Council's attention to Figure 20 of the Urban Design Statement, which shows a “potential” pedestrian and cycling network within Block 2, within the proposed Spedding Road corridor, and along the riparian margins of the Rawiri Stream and the Waiarohia Stream. This “potential” network is not based on any proposed network shown in a Council strategy or document, apart from the facilities within the Spedding Road corridor. The potential network is based on urban design principles and the accepted practice of providing paths next to watercourses for amenity reasons.

Much of the pedestrian and cycle network shown in Figure 20 is on land that falls outside of the PPC area, and on land that is not owned by Austino Limited. Accordingly, it is impractical to prescribe such connections through the precinct plan. The most appropriate approach is for the PPC to ensure that active mode connections through Block 2 are provided for / future-proofed, and to encourage connections to off-site active mode networks as they are developed or planned for on adjacent land.

For the above reasons, our full response to the Clause 23 letter will include amended Hobsonville Grove Precinct provisions that:

- a) Standard I1.6.2 (Transportation Connections) and I1.10.3 (Road Function and Design) will be amended so that collector roads provided within the precinct include cycle and pedestrian facilities. Resource consent would be required for a restricted discretionary activity if pedestrian and cycling facilities are not provided within a collector road corridor.
- b) Standard I1.6.2 (Transportation Connections) and I1.10.3 (Road Function and Design) will be amended so that the section of local road that connects the indicative collector road to Westpoint Drive includes pedestrian and cycle facilities. This will allow for Block 2 development to connect with existing cycle and pedestrian facilities on Westpoint Drive.

- c) Standard I1.6.2 (Transportation Connections) will be amended to require a pedestrian and cycling connection to the Spedding Road NOR land to either be provided or future proofed. (See above comments under U3.
- d) Precinct provisions that seek to encourage walking and cycling connections with open space land have been retained. This includes objectives, policies, and RDA matters and assessment criteria that would apply to all applications for subdivision consent.
- e) Amendments to the assessment criteria in I1.8.2(1) that applies to subdivision, which would encourage walking and cycling connections with adjacent land, particularly if it is zoned for open space purposes or to be vested with Council for recreation purposes.

Response to U5

The indicative park and the Neighbourhood Retail Opportunity overlay is not proposed to justify the application of the THAB zone in Block 2. There are many reasons why the PPC seeks to zone Block 2 THAB and MHU (Residential – Mixed Housing Urban), and not solely MHU. These reasons are provided in section 4.2.7 of the Section 32 analysis report that was lodged with the PPC request.

The WSP indicated that MHU would be appropriate for Block 2 in 2016. Since 2016, there have been significant policy changes at a national level that require land to be upzoned in appropriate locations.

While Block 2 is not located adjacent to an existing neighbourhood centre or a rapid transit corridor, Block 2 is located within walking distance to Hobsonville Road (an established bus route with proposed active mode facilities). Many bus routes connect to the Western Express (WX1) rapid transit station at Westgate, which provides frequent bus services to the Central Business District (CBD).

Furthermore, the THAB zone will be centrally located within an emerging neighbourhood that was identified for residential development within the Whenuapai Structure Plan (WSP). The location is ideally suited for a small area of high-density residential land use, being at the intersection of a collector road and the indicative local road that will connect with Westpoint Drive. These roads are needed for the wider Hobsonville / Whenuapai area to develop into an integrated and well-functioning urban environment.

These roads will also have walking and cycling facilities that will connect with the school on Trig Road and the industrial / employment area on Westpoint Drive. The THAB zone supports the objective of creating a safe and high-quality walkable neighbourhood.

It is our view that the central location within an emerging residential neighbourhood, on a future collector road, provides sufficient justification for the small pocket of THAB zone that is proposed. It will also promote housing choice and housing affordability when compared with the MHU zone provisions.

We understand that Council's Parks, Sports and Recreation team support the more central location of the proposed park when compared to where it was indicated in the WSP. (In the WSP, the park is shown next to Westpoint Drive, opposite existing industrial land use). The intention is to provide the park in a location that serves a wider residential area and not merely to cater for or offset the perceived lack of outdoor open space provided for private dwellings in the THAB zone.

The purpose of the Neighbourhood Retail Opportunity overlay is to centralise day-to-day retail offering at the intersection of two indicative collector roads and to discourage the retail commercial activities from establishing outside of the overlay. This assists with creating a centre / focal point and promote the delivery of a walkable community with a sense of place.

Response to U6

The built form outcomes that have been referred to in section 4.0 of the Urban Design Statement will be achieved by:

- a) The proposed Precinct provisions; in conjunction with
- b) The existing Residential – Terrace Housing and Apartment Building provisions (unchanged by this PPC); and
- c) The existing Auckland-wide provisions, such as E27 – Transportation (unchanged by this PPC).

Effectively, the purpose of the Neighbourhood Retail Opportunity overlay is to centralise retail offering at the intersection of two indicative collector roads and to discourage the retail commercial activities from establishing outside of the overlay. This is reflected in proposed Policies I1.3(8)-(10).

Any new retail activity within the Neighbourhood Retail Opportunity overlay will require resource consent for a restricted discretionary activity under I1.4.1(A3). Any new buildings or alterations to existing buildings to accommodate a retail activity will require resource consent under I1.4.1(A8) and will be assessed against I1.8.1(5) and I1.8.2(5) to ensure that a high-quality built form is achieved. This includes:

- a) The matters and assessment criteria relating to scale, form and appearance, and the location and design of parking and access via H6.8.1(1) and H6.8.2(1); and
- b) The location and design of outdoor seating areas; and
- c) The extent of glazing facing the street.

No front yard setback applies to buildings that accommodate retail activities within the Neighbourhood Retail Opportunity overlay. This standard, along with the provision for outdoor seating and the assessment of new buildings, will provide the means to achieve a vibrant local centre with a sense of place.

All the other development standards that apply to all new buildings and alterations to existing buildings in the THAB zone will apply.

Regards,

Harrison Grierson Consultants Limited



Bryce Powell
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