

I hereby give notice that a hearing by commissioners will be held on:

Date: Tuesday 15, Wednesday 16 and Thursday 17 June
2021
Time: 9.30 a.m.
Meeting Room: Totara Room
Venue: Level 2, Civic Annex,
31-33 Manukau Station Road, Auckland

HEARING REPORT
VOLUME 1
PRIVATE PLAN MODIFICATION 52
520 GREAT SOUTH ROAD, PAPAURA
520 GSR LIMITED

COMMISSIONERS

Chairperson Greg Hill
Commissioners Karyn Kurzeja
Mark Farnsworth

Sam Otter
SENIOR HEARINGS ADVISOR

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Note: The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual hearing procedure is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- The **applicant** will be called upon to present their case. They may be represented by legal counsel or consultants and call witnesses in support of the application. The hearing panel may ask questions of the speakers.
- The **local board** may wish to present comments. These comments do not constitute a submission however the Local Government Act allows the local board to make the interests and preferences of the people in its area known to the hearing panel.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
 - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The **applicant** or their representative then has the right to summarise the application and reply to matters raised. Hearing panel members may further question the applicant. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chairperson** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.
- Decisions are usually available within 15 working days of the hearing closing.

Please note

- that the hearing will be audio recorded and this will be publicly available after the hearing
- catering is not provided at the hearing.

A NOTIFIED PRIVATE PLAN MODIFICATION TO THE AUCKLAND UNITRY PLAN BY 520 GSR LIMITED

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Sanjay Bangs, Planner

Reporting on a proposed private plan modification to rezone land from Future Urban Zone to Mixed Housing Urban at 520 Great South Road, Papakura. The reporting officer is recommending, subject to contrary or additional information being received at the hearing, the application be **APPROVED subject to modifications**.

APPLICANT: 520 GSR LIMITED

SUBMITTERS:	
Page 93	Tingran
Page 95	Casey Norris
Page 97	Jamie MacKenzie
Page 99	Chris Caldwell
Page 102	M & J Coleman
Page 104	Priyanka Hulikoppe
Page 108	Julia Marr
Page 112	Ngāti Te Ata
Page 115	Lee and Gary Running
Page 117	Veolia Water Services
Page 123	Srinivas Reddy

Page 126	Heritage New Zealand Pouhere Taonga
Page 131	Auckland Transport
Page 138	David and Sarah Bryant
Page 140	Wainono Investments Limited

FURTHER SUBMITTERS	
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Page 143	Auckland Transport
Page 147	Judith Coleman
Page 150	Ngāti Tamaoho
Page 154	Wainono Investments Limited



Hearing Report for Proposed Plan Change 52 (Private) 520 Great South Road to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

Report to: Hearing Commissioners

Hearing Dates: 15, 16 and 17 June 2021

File No: Hearing Report – Plan Change 52 (PC52)

File Reference U:\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC052 - 520 Great South Road Papakura

Report Author Sanjay Bangs, Senior Policy Planner, Central and South Planning, Plans and Places

Report Approvers Craig Cairncross, Team Leader Central and South Planning, Plans and Places

Report produced 19 May 2021

Summary of Proposed Plan Change 52 (Private) 520 Great South Road: Rezone 4.63 ha of land at 520 Great South Road, 522 Great South Road and 21 Gatland Road from Future Urban Zone to Residential – Mixed Housing Urban Zone.

Plan subject to change	Auckland Unitary Plan (Operative in Part)
Number and name of change	Proposed Plan Change 52 (Private) 520 Great South Road, Papakura
Status of Plan	Operative in part
Type of change	Proposed private plan change
Clause 25 decision outcome	Accept for notification (3 August 2020)

Parts of the Auckland Unitary Plan affected by the proposed plan change	AUP Maps
Was Clause 4A completed	Yes (5 June 2019)
Date of notification of the proposed plan change and whether it was publicly notified or limited notified	27 August 2020 Public Notification
Submissions received (excluding withdrawals)	15
Date summary of submissions notified	09 October 2020
Number of further submissions received	4
Legal Effect at Notification	No
Date of site visits	9 March 2020 and 3 May 2021
Main issues or topics emerging from all submissions	<p>Transport matters, including transport infrastructure delivery and staging of plan change, connectivity, access and car parking</p> <p>Stormwater management</p> <p>Residential amenity and land use zoning</p> <p>Cumulative effects and consideration of wider area</p> <p>Heritage / Archaeology</p> <p>Water and wastewater servicing</p> <p>Effects on Mana Whenua</p> <p>Access to parks and open space</p>

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Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
'PC52' OR 'Plan Change'	Proposed Plan Change 52
RMA	Resource Management Act 1991
AUP(OP)	Auckland Unitary Plan (Operative in Part)
FUZ	Future Urban Zone
MHUZ	Residential – Mixed Housing Urban Zone
520 GSR	520 GSR Ltd, the applicant
'PC52 land' or 'PC52 site'	The land subject to the proposed plan change
Plan Change Request	<i>Request for Private Plan Change</i> , prepared by Barker & Associates Ltd and dated 05 February 2020.
TA	Transport Assessment supporting the plan change request
UDA	Urban Design Assessment supporting the plan change request
FULSS	Future Urban Land Supply Strategy 2017
SGA	Supporting Growth Alliance

Appendices	
Appendix 1	Proposed Plan Change 52 (Private) 520 Great South Road, As Notified
Appendix 2	Summary of Submissions and Submissions
Appendix 3	Local Board Views
Appendix 4	Clause 23 Request and Responses
Appendix 5	Specialist Assessments
Appendix 6	Proposed Modifications to PC52
Appendix 7	Council Decision to accept PC52 under Clause 25 to First Schedule RMA

1. EXECUTIVE SUMMARY

1. 520 GSR Ltd lodged a private plan change request to the Auckland Unitary Plan (Operative in Part) ('**AUP(OP)**') on 5 February 2020. On 2 July 2020 the private plan change was accepted by Council under Clause 25 of Schedule 1 to the RMA.
2. Proposed Plan Change 52 ('**PC52**') seeks to rezone 520 Great South Road, 522 Great South Road and 21 Gatland Road, Papakura from Future Urban Zone ('**FUZ**') to Residential – Mixed Housing Urban Zone ('**MHUZ**').
3. The purpose of PC52 as stated by the requestor is 'to apply an urban residential zoning to 4.6268 hectares of Future Urban [land] zoned in Papakura, consistent with the Council's Drury-Opāheke Structure Plan.'
4. The site subject to the request is identified for urban development in the policy documents on future urban growth in Auckland. The Future Urban Land Supply Strategy 2017 ('**FULSS**') identifies the land as being development ready by between 2028 – 2032. The Drury-Opāheke Structure Plan 2019 ('**DOSP**') identifies the land as being developed as Mixed Housing Urban once it is urbanised.
5. The preferred transport network to support the southern growth areas, as identified by Supporting Growth Alliance contains a mixture of funded and unfunded projects. Funded projects include a new railway station in Drury Central, improvements to SH1 and upgrades to Mill Road. Unfunded projects relevant to this plan change include the upgrade of Great South Road to a Frequent Transit Network ('**FTN**').
6. Further information was sought from the applicant by the Council in accordance with Clause 23 of Schedule 1 to the RMA on 6 April 2020. The applicant provided further information in response to the Clause 23 request on the early release of land compared with the FULSS, vehicle access and safe sightlines, pedestrian facilities and Great South Road improvements, traffic generation, stormwater and flooding and geotechnical matters.
7. PC52 was publicly notified by the council on 27 August 2020. After the closing date of submissions on 24 September 2020, 15 submissions were received. The council's summary of decisions requested was publicly notified on 9 October 2020 with the period for making further submissions closing on 23 October 2020. Four further submissions were received.
8. In preparing for hearings on PC52, this hearing report has been prepared in accordance with section 42A of the RMA.

9. This report addresses the merits of PC52, with reference to an assessment of effects on the environment and the issues raised by submissions. The discussion and recommendations in this report are intended to assist the Hearing Commissioners, the requestor and those persons or organisations that lodged submissions on PC52.
10. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
11. This report also forms part of council's ongoing obligations under section 32 of the RMA, to consider the appropriateness of the proposed objectives and provisions in PC52, as well as the benefits and costs of any policies, rules or other methods, as well as the consideration of issues raised in submissions on PC52.
12. A report in accordance with section 32 of the RMA was prepared by the applicant as part of the private plan change request as required by clause 22(1) of Schedule 1 of the RMA. In accordance with an evaluation under section 32, I consider that the provisions, as proposed to be modified in this report, are the most appropriate to achieve the objectives of the AUP(OP) and the purpose of the RMA.
13. It is recommended that PC52 be approved, subject to the following modifications, which have been considered under section 32AA of the RMA:
 - a) Application the Stormwater Management Area Flow 1 ('**SMAF 1**') control to the PC52 site; and
 - b) Application of precinct provisions to manage stormwater quality and quantity and to require local transport improvements to be implemented.
14. However, approval of PC52 is dependent on the findings of the following evidence provided on the following matters:
 - a) Evidence to determine that sufficient water capacity is available in the reticulated network to service the site; and
 - b) Evidence from submitter Ngāti Te Ata Waiohua and further submitter Ngāti Tamaoho Trust outlining their cultural preferences in regard to PC52.

2. BACKGROUND, PLAN PROVISIONS AND REQUEST

2.1 Site and surrounding area

15. The applicant has provided a description of the PC52 land and surrounds, set out in Section 4.0 of the Plan Change Request. This is depicted in **Figure 1** below. Having visited the site on 3 March 2020, I concur with the applicant's assessment. This is summarised below.
16. The site subject to the request comprises three properties, being 520 and 522 Great South Road and 21 Gatland Road (the subject site), which is collectively 4.63ha in area. 520 Great South Road is owned by the plan change applicant and makes up the majority of the site (3.02ha).
17. The subject site contains three dwellings and a health food store, with the balance held in pasture. The property at 520 Great South Road slopes gently down to a watercourse at the northeastern boundary.
18. The subject site is zoned Future Urban Zone in the AUP(OP) (refer to **Figure 2**). The Future Urban Zone is a transitional zone applying to greenfield land that has been identified as suitable for urbanisation, but cannot yet be used for urban activities. As a

holding zone for future development, the FUZ enables a range of rural activities and development to occur until the land is rezoned for urban purposes through a plan change process. In the interim, rural activities that align with those enabled in the Rural Production Zone are provided for.

19. The Regional Policy Statement ('RPS') section of the AUP(OP) requires the rezoning of FUZ land to follow the structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.
20. Great South Road adjacent to the subject site is identified as an Arterial Road within the AUP(OP). Under Chapter E27 – Transport of the AUP(OP), new vehicle crossings and replacements of existing crossings to and from Arterial Roads require resource consent in order to maintain the effective and safe operation of arterial roads, and ensure safe and functional access to sites.
21. The site is also subject to the Macroinvertebrate Community Index (Rural and Urban) which outline guidelines for freshwater ecosystem health, derived from the different land uses within a given catchment.
22. The surrounding area can be described as peri-urban, with both urban and rural features fragmented throughout. Established residential areas are generally aligned along the Great South Road corridor between Papakura and Drury, west and north of the subject site. Immediately east and north of the site is the Papakura South Cemetery.
23. The site is situated approximately 3km south of the Papakura town centre and 1.5km north of the Drury town centre. The land is also located within 2km of motorway interchanges at Papakura and Drury, and within 2.5km of the existing Papakura Train Station which features a 230 space park and ride facility. The 376 bus route operates along Great South Road between Drury and Papakura Station, at a frequency of every 30 minutes at peak times.
24. The wider Opāheke area east of the site is subject to flooding constraints, identified by council's flood plains maps and the Coastal Inundation (1 per cent AEP plus 1m sea level rise) control in the AUP(OP). These are shown in **Figure 3** below.

Figure 1: Aerial map of subject site and surrounds



Figure 2: Zoning map of subject site and surrounds

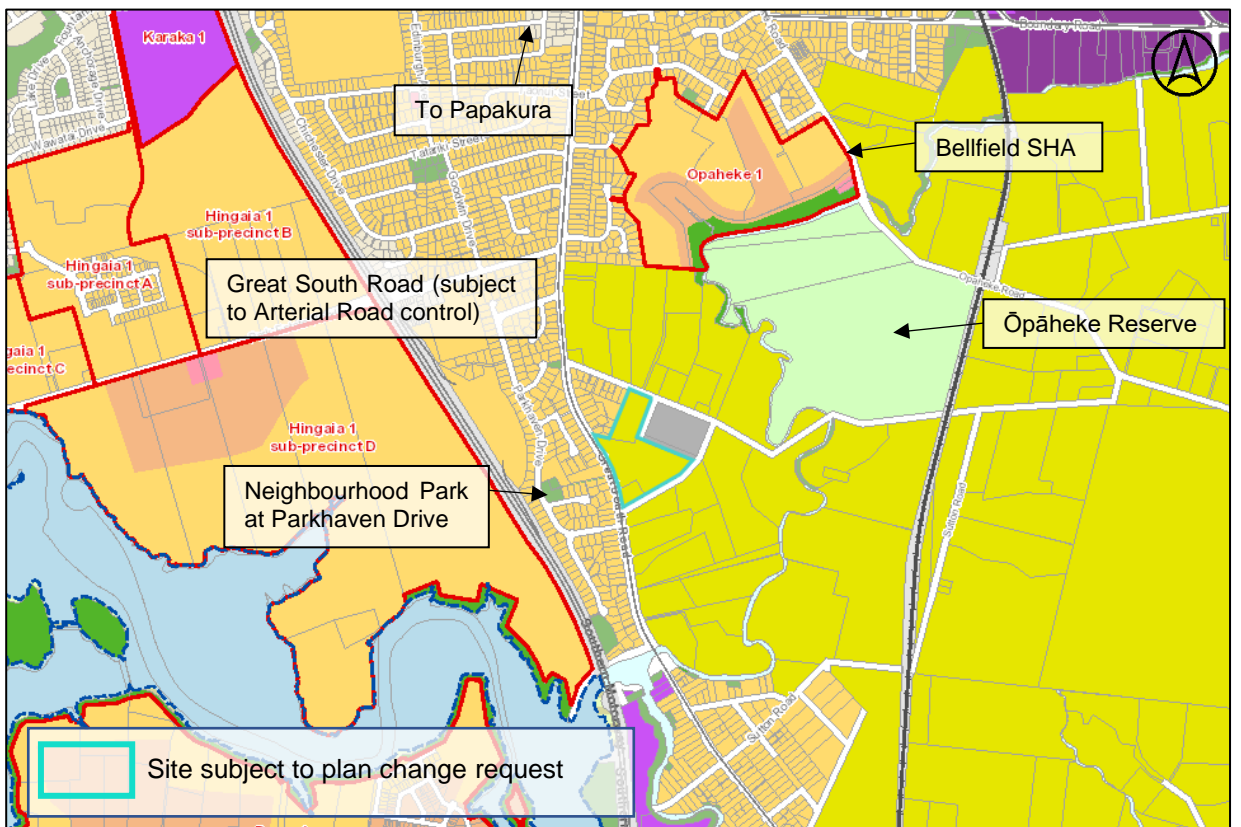
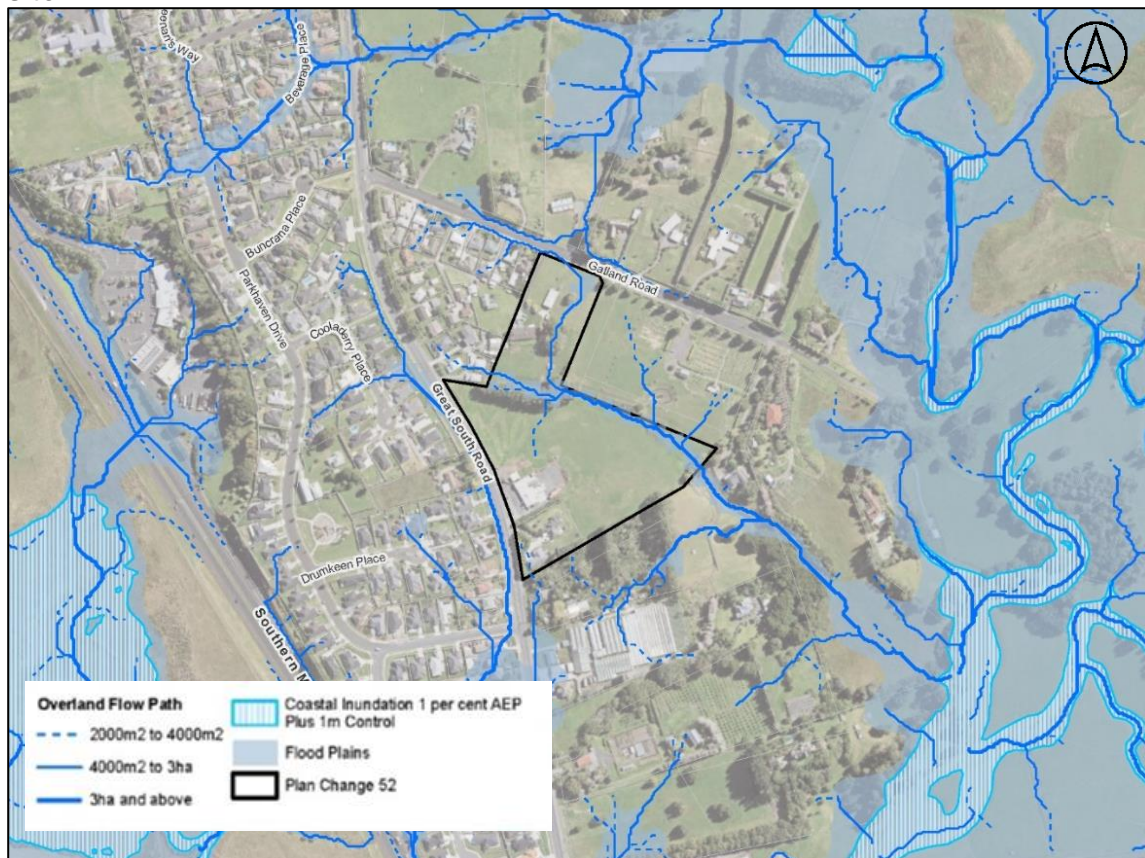


Figure 3: Overland flow paths, and flooding and inundation within and around PC52 site



2.2 Strategic context

25. The Auckland Plan 2050 seeks that most of Auckland's anticipated population and dwelling growth over the next 30 years be within the existing urban area. The remaining development is anticipated to occur in future urban areas and in rural areas. The AUP identifies approximately 15,000 hectares of rural land for future urbanisation with the potential to accommodate approximately 137,000 dwellings and 67,000 jobs. Within the south, 6,706ha of land is zoned for future urban growth. The FULSS expects this to accommodate approximately 50,600 dwellings and 30,300 jobs.
26. Of this, an additional 93,809 residents are anticipated, 60,000 within the Drury-Opāheke structure plan area and 33,809 within the Pukekohe-Paerata structure plan area, whilst 17,000 new jobs are expected to be accommodated within these areas.
27. The Future Urban Land Supply Strategy 2017 sets out the sequencing of future urban land for development within Auckland. The FULSS stages the supply of such land to ensure that new growth is supported by the necessary infrastructure networks, and to help inform infrastructure investment decisions made by the council, central government and the private sector.
28. The FULSS identifies the PC52 land and surrounding Drury and Opāheke area east of SH1 as being development ready within 2028-2032 (Decade Two 1st half) of the FULSS. In comparison, some other areas within the south are scheduled earlier in Decade One, for instance, Paerata and Drury West from 2018-2022 (Decade One, 1st Half) and Pukekohe from 2023 – 2027 (Decade One, 2nd Half).
29. The principles adopted to determine this sequencing are outlined in Appendix 1 and 2 to the FULSS. Appendix 1 lists the high level principles to assist with understanding which

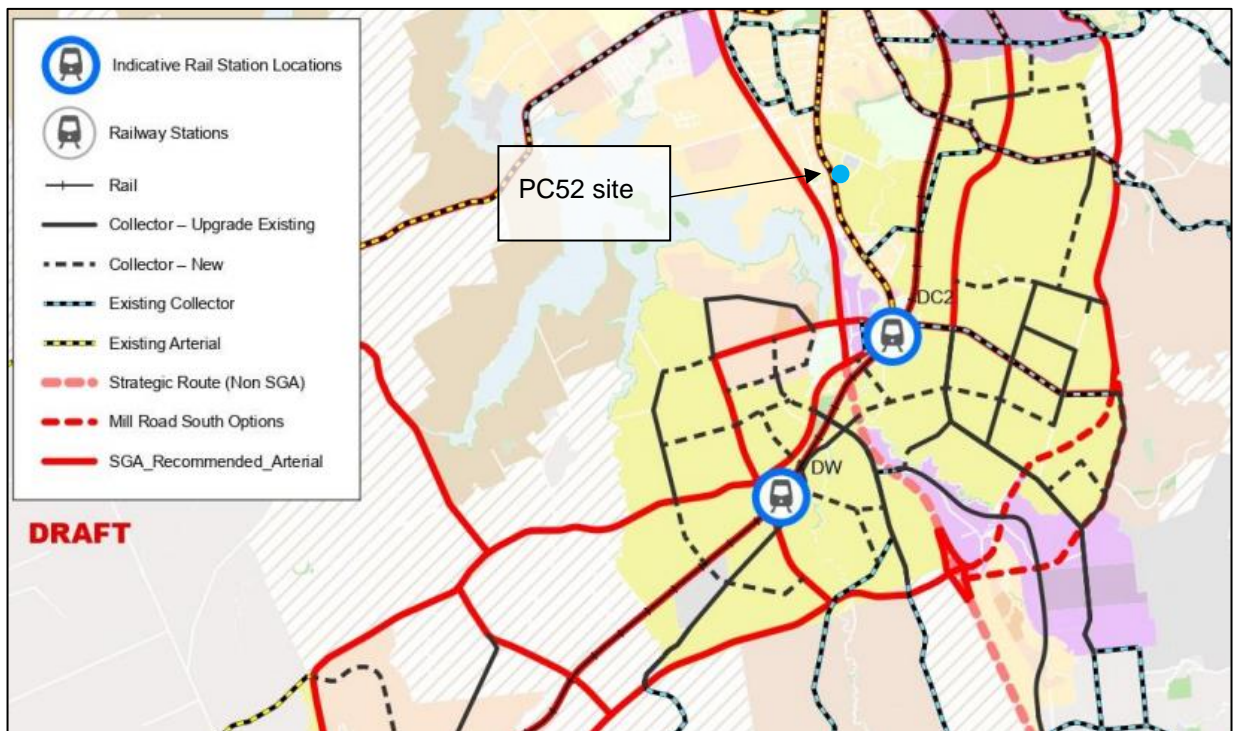
future urban areas will achieve the greatest benefits for Auckland over the short, medium and long term timeframes of the strategy. The general principles are:

1. Optimise the outcomes from investment
 2. Supply land on time
 3. Support uplifting Māori social, environmental, economic and cultural wellbeing
 4. Create good quality places
 5. Work collaboratively in partnership.
30. Appendix 2 provides a brief summary of the key rationale for sequencing and timing of areas within the FULSS. The reasons identified for sequencing of the Hingaia, Opāheke-Drury and Drury West areas are that:
- Bulk infrastructure is required to service the wider area, including augmenting the Southern and Southwestern wastewater interceptors
 - The Opāheke area is subject to complex flooding issues, which need to be resolved through comprehensive catchment-wide and potentially cross-catchment solutions, in combination with development of wastewater infrastructure ¹.
31. The information from the FULSS on sequencing and timing of future urban areas has been incorporated into the Auckland Plan 2050 Development Strategy (adopted June 2018). The addition of this information complements information in the Development Strategy on development areas and nodes in the existing urban areas. Together this information provides a comprehensive list of areas in the existing urban area and the future urban areas where significance development is anticipated over the next 30 years. It is noted that the Auckland Plan 2050, Development Strategy was also adopted by council as its Future Development Strategy under the National Policy Statement on Urban Development Capacity.
32. The Drury-Opāheke Structure Plan 2019 (**DOSP**) outlines how growth anticipated within this area can be achieved by indicating the location of future land use zonings, infrastructure and constraints within Drury and Opāheke. This includes the location of residential areas, town centres, business areas and critical infrastructure amongst other elements. The key aspects of the DOSP as they relate to PC52 are:
- The Land Use Map (Figure 1 of the DOSP) identifies PC52 and immediate surrounds as zoned being Mixed Housing Urban;
 - The Blue-Green Network (Figure 8 of the DOSP) identifies a *Permanent or Intermittent Stream and 20m Riparian Margin* extending from the easternmost extent of the watercourse on the PC52 site.
 - The Blue-Green Network also identifies two Neighbourhood Parks proximate to the site, and a Greenway (local path for walking cycling and ecological connections) on Gatland Road, connecting to Opāheke Park.

¹ p.32, Appendix 2, Future Urban Land Supply Strategy <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-by-laws/our-plans-strategies/topic-based-plans-strategies/housing-plans/Documents/future-urban-land-supply-strategy.pdf>

33. Through Te Tupu Ngātahi Supporting Growth Alliance ('SGA'), Auckland Transport ('AT') and Waka Kotahi New Zealand Transport Agency have identified the preferred transport network and interventions required to support future urban growth in the southern sector (refer to **Figure 4** below). Of particular relevance to this plan change request are the following projects identified by SGA:
- A new train station (Drury Central) on the eastern side of SH1;
 - Electrification of the railway track between Papakura and Pukekohe;
 - Great South Road developed as a Frequent Transit Network bus route

Figure 4: Excerpt from Supporting Growth Draft Integrated Transport Assessment Figure 0-1 – Overall proposed transport network, ²



34. In January 2021, SGA lodged Notices of Requirement ('NoRs') to route protect five strategic transport corridors identified in the preferred transport network for the south. Of particular relevance to PC52 are two projects for improvements east of the subject site, being a New Opāheke Road North/South FTN Arterial, and upgrades to Ponga Road an Opāheke Road. These projects are discussed in greater detail in Section 8 of this report in relation to transport effects.
35. In January 2020, Central Government committed funding to transport infrastructure projects through the New Zealand Upgrade Programme ('NZUP'). The NZUP allocated funding to the following projects within Drury-Opāheke:

² p. 14, Supporting Growth Draft Integrated Transport Assessment, <https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/structure-planning-update-for-drury-opaheke-and-pukekohe-paerata-april-2019/docscombined/36-supporting-growth-integrated-transport-assessment.pdf>

- a) Fully funding the two new railway stations in Drury Central and Drury West, along with 'park and ride' facilities, with construction of the stations commencing in 2023;
 - b) Fully funding the electrification of the railway track from Papakura to Pukekohe, with construction commencing late 2020; and
 - c) State Highway 1 Papakura to Drury improvements, including three-laning the state highway and upgrading the Drury interchange, to be completed by 2025.
36. The funding allocation for these projects was incorporated into the Auckland Transport Alignment Project 2021-2031 ('**ATAP**'), an agreed investment programme between Central Government and Auckland Council on transport priorities for Auckland. In relation to PC52, ATAP outlines investment for the 'Drury & Paerata Growth Area' (\$243m), for transport infrastructure in the Drury area to support the NZUP investment. The timing and details of the projects are not specified in ATAP.

2.3 Resource consents

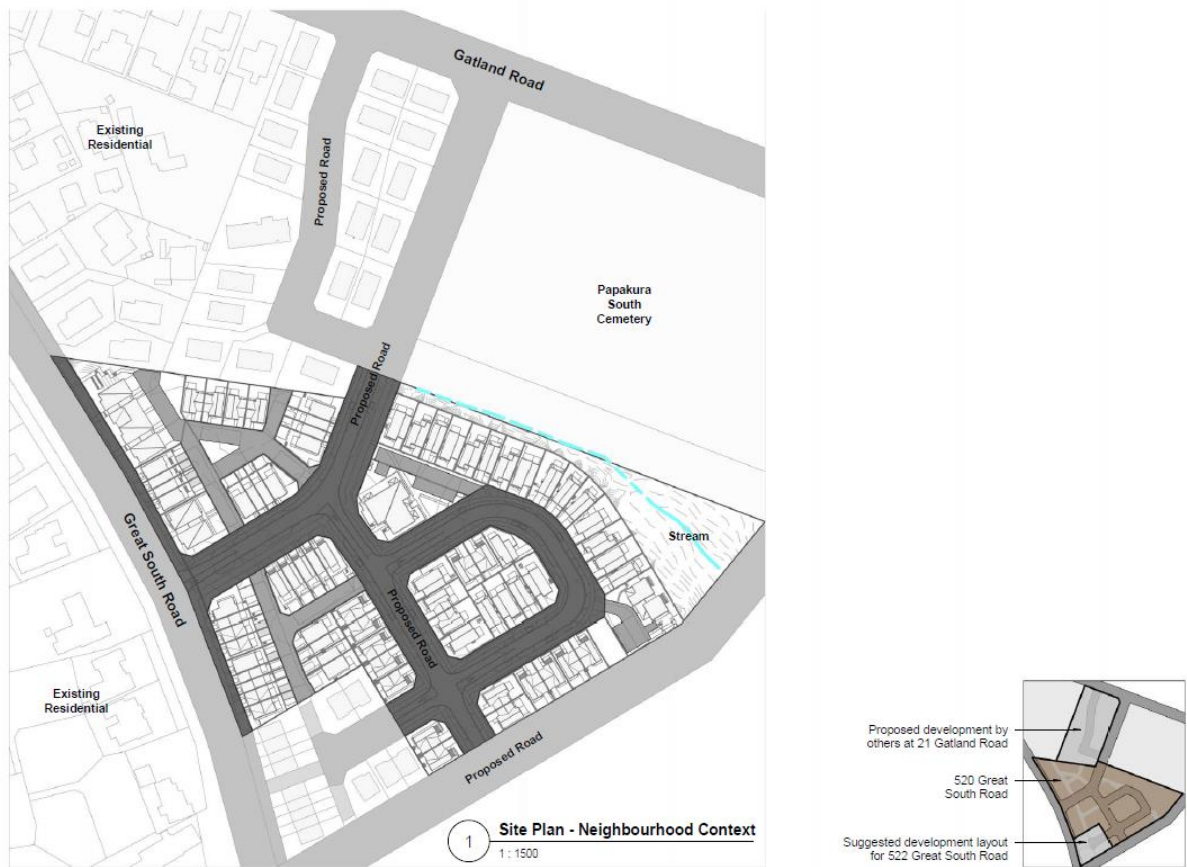
37. Resource consents have been lodged at 520 Great South Road and 21 Gatland Road for residential subdivision and development. These are described below.

520 Great South Road - BUN60356792

38. A bundled land use and subdivision resource consent has been sought over 520 Great South Road by 520 GSR Ltd³, the PC52 applicant. The resource consent application seeks to establish 102 new dwellings in a mixture of medium density typologies including duplex, terrace and walk-up apartments, bulk earthworks, the formation of roads and accessways, and subdivision around the resultant development (refer to **Figure 5** below).

³ BUN60356792

Figure 5: 520 Great South Road Resource Consent Application Proposed Plan (BUN60356792)



39. 520 GSR Ltd has requested that this resource consent application be heard concurrently with PC52, given that similar matters are being considered for both the plan change and resource consent application. The applicant notes:

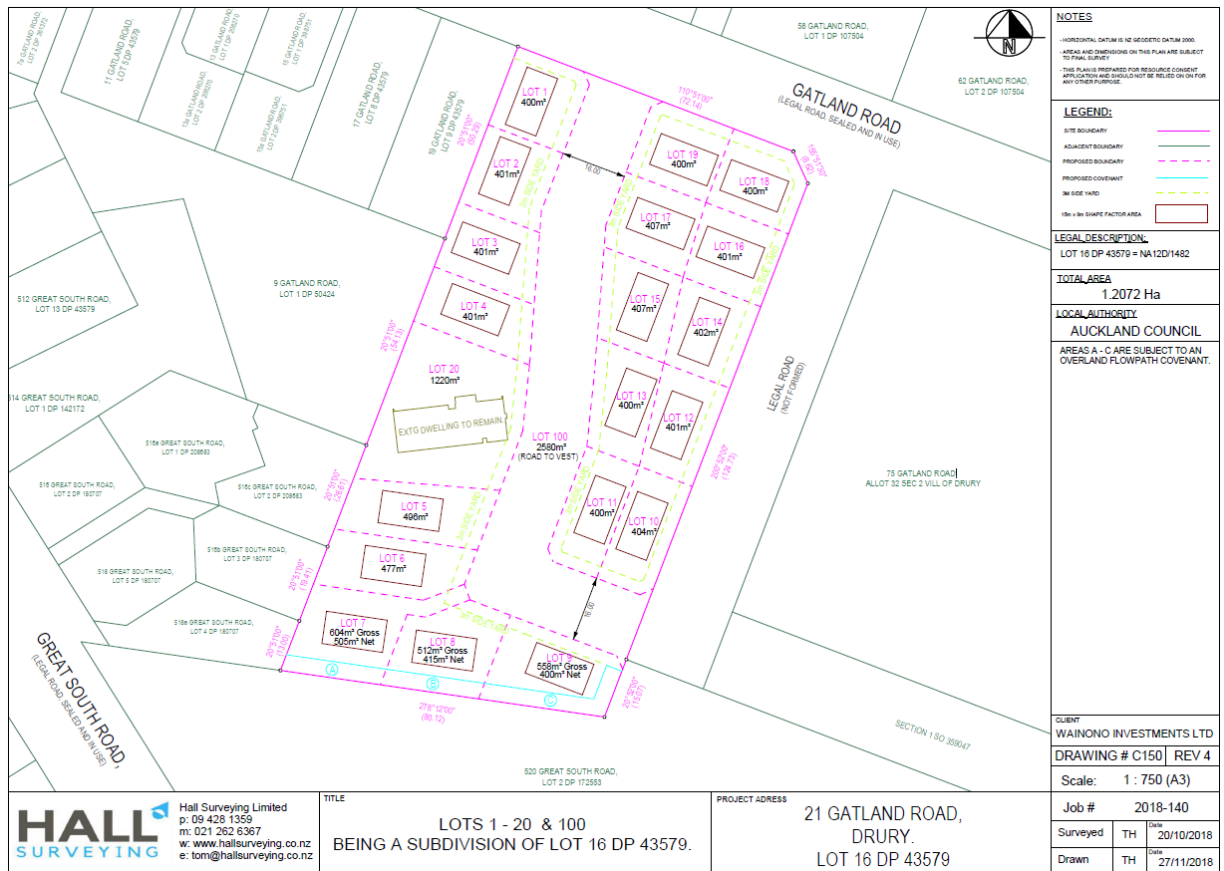
It is requested that this application for resource consent is considered and processed by Council in parallel with the private plan change. The site is unique in that it is located within an established urban environment whereby the prevailing pattern of land use is residential dwellings; the site is and can be fully serviced with the necessary infrastructure and the site is readily accessible to the transport network. Accordingly, it is our view that there are no compelling reasons as to why the private plan change application could be declined or for the proposed Mixed Housing Urban (MHU) zoning proposed to be inappropriate, given that this is consistent with the Council's future planning for this land.

21 Gatland Road - BUN60336702

A subdivision consent has been sought over 21 Gatland Road by Wainono Investments Ltd⁴ to establish 20 residential sites, associated service connections, a new road to be vested in Council and the formation of the unformed road adjoining the eastern site boundary (refer to scheme plan in **Figure 6** below).

⁴ BUN60336702

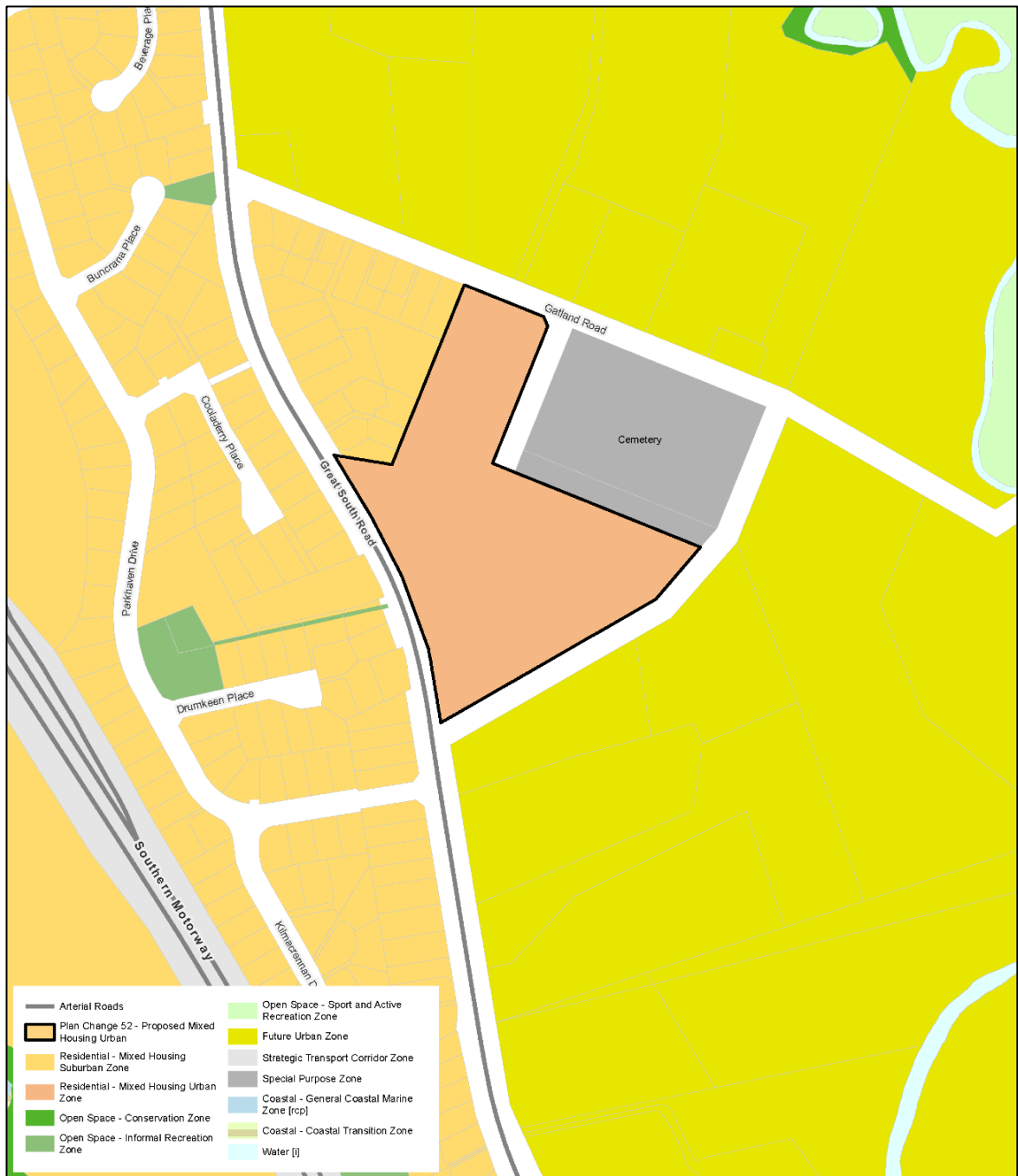
Figure 6: 21 Gatland Road Resource Consent Application Proposed scheme plan (BUN60336702)



2.4 Proposed Private Plan Change Request

- 40. On 5 February 2020 council received a private plan change request (PC52) from 520 GSR Ltd. The proposed plan change seeks rezone to 520 Great South Road, 522 Great South Road and 21 Gatland Road, Papakura from Future Urban Zone to Residential – Mixed Housing Urban Zone.

Figure 7: Proposed AUP(OP) zoning of PC52 site



41. Chapter H5 of the AUP(OP) states that the MHUZ is a reasonably high-intensity zone providing residential development typically up to three storeys in a variety of sizes and forms. Detached dwellings, terrace housing and low-rise apartments are anticipated in the MHUZ.
42. Some of the key aspects of the MHUZ are:
 - Dwellings permitted up to three per site, with four or more dwellings requiring resource consent as a RDA to assess a range of matters including: consistency with planned character; achieving attractive and safe streets and open space; managing height, bulk and location of development to maintain sunlight access and privacy, and

minimising visual dominance to adjoining sites; quality of outdoor living space; and infrastructure network capacity;

- Maximum building height of 10m;
- Maximum building coverage of 45%, maximum impervious area of 60% and minimum landscaping of 40%;
- Height in relation to boundary standard of 2.5m plus 45 degrees, at the boundaries of sites zoned Residential – Single House, Residential – Mixed Housing Suburban or sites less than 2,000m² with an Open Space zoning;
- Height in relation to boundary standard of 3m + 45 degrees, at the boundaries with residential zoned sites;
- Minimum yards, including a 2.5m front yard, 1m rear and side yards, and 10m riparian yards as applying from the edge of all permanent and intermittent streams;

43. The purpose of the plan change, as stated by the requestor, is:

“to apply an urban residential zoning to 4.6268 hectares of Future Urban zoned in Papakura, consistent with the Council’s Drury-Opāheke Structure Plan.”⁵

44. 520 GSR Ltd has provided the following reports and documents to support their application for PC52⁶:

Appendix no.	Document	Author	Date
1	Private Plan Change Request and Section 32 Assessment, prepared by	Barker & Associates	25 May 2020
2	Plan Change Zoning Map	Barker & Associates	-
3	List of Affected Properties and Certificates of Title and Restrictions;		
4	Drury-Opāheke Structure Plan 2019		
5	RPS Objectives and Policies Assessment Table	Barker & Associates	-
6	Urban Design Assessment	Barker & Associates	27 June 2019
7	Transport Assessment	Traffic Planning Consultants	27 June 2019
8	Stormwater Memo	Tonkin & Taylor	28 June 2019
9	Engineering and Infrastructure Report	Blue Barn Consulting Engineers	June 27 2019

⁵ p.10, Planning and Section 32 Report

⁶ Note that where applicable this includes documents that have been revised by the applicant in response to further information requests.

10	Geotechnical Report	Engeo	2 July 2019
11	Copies of approved resource consent decisions and plans		
12	Analysis of alternative staging against the FULSS 2017	Barker & Associates	-
13	Stormwater Management Plan	Tonkin & Taylor	4 May 2020
-	Stormwater Management Plan (Rev)	Tonkin & Taylor	7 May 2021

2.5 Clause 23 Requests for Further information

45. On 6 April 2020, prior to accepting PC52, the Council requested that the applicant provide further information in accordance with Clause 23 of Schedule 1 to the RMA. This request is attached as Appendix 4 to this report. The purpose of the further information request was to enable Council to better understand the effects of PC52 on the environment and the ways in which adverse effects may be mitigated. The key information sought through the Clause 23 request related to the following matters:

- Planning and general matters
 - Additional section 32 assessment
 - Analysis against the release of land scheduled in the FULSS
 - Consultation with iwi groups
 - Consistency with the RPS matters, particularly those relating to B2 Urban growth and form and B7.3 Stormwater
 - Quality of access to convenience retail and commercial service amenities;
- Transport
 - Vehicle access, and the ability to achieve safe sightlines;
 - Pedestrian network and connectivity;
 - Great South Road improvements, including the delivery of such improvements and feasibility of road widening;
 - Traffic generation
 - Future road connections
- Other matters
 - Provision of a Stormwater Management Plan
 - How hydrological mitigations will be delivered, such as through a SMAF Control
 - Geotechnical constraints within the watercourse at the eastern corner of the site;

46. 520 GSR Ltd responded to the Clause 23 request in full on 16 June 2020. This response is also contained within Appendix 4 to this report. In response to the Clause 23 request, the applicant provided the following material:

- Covering planning RFI response
- Engineering, geotechnical and transport RFI's

- Revised Private Plan Change Request
 - RPS Objectives and Policies Assessment Table (Appendix 4)
 - Analysis of alternative staging against the FULSS 2017
 - Stormwater Management Plan
47. Having reviewed the applicant's Clause 23 response and the reports and materials attached, I consider that the further information requests have been satisfied. In making this determination, I have relied on the advice of technical experts listed in Section 5 of this report.
48. The Plan Change request was accepted for notification under Clause 25 to Schedule 1 RMA on 3 August 2020.

3. HEARINGS AND DECISION MAKING CONSIDERATIONS

49. Clause 8B (read together with Clause 29) of Schedule 1 of RMA requires that a local authority shall hold a hearing into submissions on a proposed private plan change.
50. Auckland Council's Combined Chief Executives' Delegation Register delegates to hearing commissioners all powers, duties and functions under the Resource Management Act 1991. This delegation includes the authority to determine decisions on submissions on a plan change, and the authority to approve, decline, or approve with modifications, a private plan change request. Hearing Commissioners will not be recommending a decision to the council, but will be making the decision directly on PC52.
51. In accordance with s42A(1), this report considers the information provided by the applicant and summarises and discusses submissions received on PC52. It makes recommendations on whether to accept, in full or in part; or reject, in full or in part; each submission. This report also identifies what amendments to the PC52 provisions are recommended, if any, to address matters raised in submissions. This report makes a recommendation on whether to approve, decline, or approve with modifications PC52. Any conclusions or recommendations in this report are not binding on the Hearing Commissioners.
52. The Hearing Commissioners will consider all the information submitted in support of the proposed plan change, information in this report, and the information in submissions together with evidence presented at the hearing.
53. This report relies on the reviews and advice from the following experts on behalf of the council and specialist Auckland Council officers. These assessments are attached in **Appendix 5** to this report.

Table 1: Specialist input to s42a report

Matter	Reviewing specialist
Planning	Sanjay Bangs, Senior Policy Planner, Central South Team 1, Plans and Places, Chief Planning Office, Auckland Council
Technical experts	
Urban Design	Lisa Mein, Director, Mein Urban Design and Planning Limited

Transport	Mat Collins and Terry Church, Flow Transportation Consultants Ltd
Stormwater and Flooding	Chloe Trenouth, Healthy Waters Consultant, Healthy Waters Department, Auckland Council
Geotechnical	Shane Lander, Principal Geotechnical Engineer Managing Director, Lander Geotechnical Consultants Limited
Water and Wastewater	Arun Niravath, Senior Development Engineer, Regulatory Engineering South, Auckland Council
Parks and Open Space	Ashleigh Richards, Parks Planner, Park Services, Parks Sports and Recreation, Customer & Community Services, Auckland Council

4. STATUTORY AND POLICY ASSESSMENT

54. Private plan change requests can be made to the Council under clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as Council initiated plan changes, and the private plan change request must contain an evaluation report in accordance with section 32 and clause 22(1) in Schedule 1 of the RMA.
55. Clause 29(1) of Schedule 1 of the RMA provides “except as provided in subclauses (1A) to (9), Part 1, with all necessary modifications, shall apply to any plan or change requested under this Part and accepted under clause 25(2)(b)”.
56. The RMA requires territorial authorities to consider a number of statutory and policy matters when developing proposed plan changes. There are slightly different statutory considerations if the plan change affects a regional plan or district plan matter.
57. The following sections summarises the statutory and policy framework, relevant to PC52.

4.1 Resource Management Act 1991

58. The key directions of the RMA with regard to consideration of private plan changes is set out in the below paragraphs.

Table 2: Sections of the RMA relevant to private plan change decision making

RMA Section	Matters
Part 2	Purpose and principles of the RMA.
Section 31	Outlines the functions of territorial authorities in giving effect to the Resource Management Act 1991
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal

RMA Section	Matters
Section 67	Contents of regional plans – sets out the requirements for regional plan provisions, including what the regional plan must give effect to, and what it must not be inconsistent with
Section 72	Sets out that the purpose of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of this Act.
Section 73	Sets out Schedule 1 of the RMA as the process to prepare or change a district plan
Section 74	Matters to be considered by a territorial authority when preparing a change to its district plan. This includes its functions under section 31, Part 2 of the RMA, national policy statement, other regulations and other matter
Section 75	Contents of district plans – sets out the requirements for district plan provisions, including what the district plan must give effect to, and what it must not be inconsistent with
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities. It also sets out the process for private plan change applications.

59. The mandatory requirements for plan preparation are comprehensively summarised by the Environment Court in *Long Bay-Okura Great Park Society v North Shore City Council*, Environment Court Auckland A078/2008, 16 July 2018 at [34] and updated in subsequent cases including *Colonial Vineyard v Marlborough District Council* [2014] NZEnvC 55 at [17]. When considering changes to district plans, the RMA sets out a wide range of issues to be addressed. The relevant sections of the RMA include sections 31-32 and 72-76 of the RMA.
60. The tests are the extent to which the objective of PC52 is the most appropriate way to achieve the purpose of the Act (s32(1)(a)) and whether the provisions:
- accord with and assist the Council in carrying out its functions (under s 31) for the purpose of giving effect to the RMA;
 - accord with Part 2 of the RMA (s 74(1)(b));
 - give effect to the AUP regional policy statement (s 75(3)(c));
 - give effect to any national policy statement (s 75(3)(a));
 - have regard to the Auckland Plan 2050 (being a strategy prepared under another Act (s 74(2)(b)(i)));
 - have regard to the actual or potential effects on the environment, including, in particular, any adverse effect (s 76(3));
 - are the most appropriate method for achieving the objectives of the AUP, by identifying other reasonably practicable options for achieving the objectives (s 32(1)(b)(i)); and by assessing their efficiency and effectiveness (s 32(1)(b)(ii)); and:

- identifying and assessing the benefits and costs of 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 (s 32(2)(a)(i)); and
 - (ii) employment that are anticipated to be provided or reduced (s 32(2)(a)(ii));
- if practicable, quantifying the benefits and costs (s 32(2)(b)); and
- assessing the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions (s 32(2)(c)).

61. Under section 74(1)(e) the decision maker must also have particular regard to the section 32 evaluation report prepared in accordance with s 32(s 74(1)(e)).

4.2 National policy statements

62. Pursuant to Sections 74(1)(ea) and 75 RMA, the relevant national policy statements must be given effect to in the preparation of the proposed plan change, and in considering submissions.

4.2.1 National Policy Statement on Urban Development 2020 ('NPS-UD')

Theme	Sections
Well-functioning urban environments	<p>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.</p> <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: <ul style="list-style-type: none"> (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.
Changing urban environments	<p>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.</p>

Theme	Sections
	<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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
Integration of land use and infrastructure	<p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> (a) integrated with infrastructure planning and funding decisions;
Responsiveness to development capacity	<p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> (c) responsive, particularly in relation to proposals that would supply significant development capacity. <p>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:</p> <ul style="list-style-type: none"> (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.
Sufficient capacity	<p>Clause 3.2 (1) Sufficient development capacity for housing Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet expected demand for housing:</p> <ul style="list-style-type: none"> (a) in existing and new urban areas; and (b) for both standalone dwellings and attached dwellings; and (c) in the short term, medium term, and long term <p>(2) In order to be sufficient to meet expected demand for housing, the development capacity must be:</p> <ul style="list-style-type: none"> (c) plan-enabled (see clause 3.4(1)); and (d) infrastructure-ready (see clause 3.4(3)); and (e) feasible and reasonably expected to be realised (see clause 3.26); and (f) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22).

Theme	Sections
Climate change	<p>Objective 8: New Zealand’s urban environments:</p> <p>(a) support reductions in greenhouse gas emissions; and</p> <p>(b) are resilient to the current and future effects of climate change.</p> <p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <p>(e) the likely current and future effects of climate change.</p>

Well-functioning urban environments

- 63. I consider that PC52 will contribute to a well-functioning urban environment in the medium-term and long-term. The MHUZ provides for a range of house sizes, densities and typologies to meet different price points and other needs within the housing market. Once wider transport improvements have been implemented, primarily the FTN on Great South Road, Drury Central Train Station, and electrification from Papakura to Pukekohe, the site will enjoy access to amenities in the Papakura and Drury Centres, and better connectivity to the wider public transport network.
- 64. In the short term, PC52 may not provide for a well-functioning urban environment, as the level of public transport service currently does not provide for good accessibility between proposed residential zonings and the amenities outlined in Policy 1(c). However, a reasonable level of accessibility currently exists, both by public transport (376 bus operating every half hour at peak times) and more realistically by private vehicles. The applicant’s transport assessment finds that the plan change can be accommodated whilst maintaining an adequate level of service on the surrounding transport network. As this is an interim situation, and that a reasonable level of access to amenities exists on the site, I am satisfied that PC52 will give effect to the intent of the NPS-UD to provide a well-functioning urban environment.
- 65. Climate change matters are discussed later in this section.

Planned built form

- 66. In my view, the proposal is consistent with the planned built character of the area expressed in the land use zonings selected in the DOSP, and as such a change in amenity values to reflect a compact built form with smaller sections can be readily anticipated in the area north and east of the PC52 site.

Integration with infrastructure planning and funding

- 67. Objective 6(a) of the NPS-UD seeks that decisions on urban development are integrated with infrastructure planning and funding decisions. Policy 10 requires local authorities to engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning.
- 68. The NPS-UD defines development infrastructure as network infrastructure for water supply, wastewater and stormwater, and land transport as defined in the Land Transport Management Act 2003, to the extent that they are controlled by a local authority or council controlled organisation.

69. Additional infrastructure is defined in the NPS-UD as including public open space, community infrastructure as defined under section 197 of the Local Government Act 2002, land transport not controlled by local authorities, social infrastructure (schools and hospitals etc), and telecommunications and electricity/gas networks. Community infrastructure has a wide-ranging definition in the Local Government Act 2002 including all land or development assets on land owned or controlled by the territorial authority for the purpose of providing public amenities.
70. Clause 3.4(3) of the NPS-UD defines 'infrastructure-ready' in relation to determining whether sufficient development capacity is provided. In the short term, infrastructure-ready means adequate existing development infrastructure. In the medium term, it means both existing development infrastructure, and that adequate infrastructure is identified in a long-term plan. Whilst 'adequate infrastructure' is not defined in the NPS-UD, it implies that such infrastructure does not need to be optimal yet, and that some misalignment between online development capacity and implementing infrastructure can be tolerated.
71. From this perspective, the infrastructure that may be required to support PC52 can be categorised into:
- a) Development infrastructure upgrades to mitigate the cumulative effects of growth in the wider area.
 - b) Local development infrastructure upgrades, which relate to the safe and efficient operation of the immediate network. These are primarily road widening to protect a sufficient Great South Road corridor for future improvements, construction of an intersection/right turn bay into the PC52 site, upgrade of the Great South Road frontage to an urban standard and provision of a pedestrian crossing on Great South Road
 - c) Additional infrastructure, including public open space, community infrastructure and social infrastructure.
72. The development infrastructure required to mitigate the cumulative effects of growth in the wider area include the following transport projects:
- a) Two new railway stations in Drury Central and Drury West, supported by park and ride facilities. Construction of these is anticipated to start in 2022 and be completed by late 2024 (\$247m, funded by NZUP and ATAP).
 - b) Electrifying the railway track between Papakura to Pukekohe with space for additional lines for future growth, to be constructed by 2024⁷ (funded by NZUP and ATAP).
 - c) Widening SH1 from Papakura to Drury and building a cycleway alongside it. Construction is expected to start later this year, and completed by 2025⁸ (\$423m, funded by NZUP and ATAP).

⁷ p. 38 Assessment of Environmental Effects, Fast-track application <https://www.epa.govt.nz/fast-track-consenting/listed-projects/papakura-to-pukekohe-rail-electrification/application-papakura-to-pukekohe-rail-electrification/>

⁸ <https://www.nzta.govt.nz/planning-and-investment/nz-upgrade/auckland-package/papakura-to-drury-south/>

- d) Upgrading Mill Road to four lanes and connecting Manukau to Drury. Construction is expected to start in late 2022 and completed by 2027/2028⁹ (1,354m funded by NZUP and ATAP).
- e) Upgrade of Great South Road to a FTN standard (unfunded)
- f) Drury Arterial Network projects, including the Opāheke north-south connection, a new arterial road connection from Hunua Road to Waihoehoe Road, and an upgrade to Waihoehoe Road between the proposed north-south arterial and Mill Road (unfunded).

Projects (a) – (d) are identified as being funded by NZUP and ATAP, whereas (e) – (f) are currently not identified in central or local government funding programmes.

- 73. In addition to transport projects, bulk wastewater infrastructure is identified by the FULSS as being necessary to support growth in Drury-Opāheke. As outlined in Section 6.6.2 of this report, the Auckland Council Long-Term Plan 2018-2028 identifies funding for the augmentation of the Southern Interceptor, primarily within 2019-2028 (\$2.125b).
- 74. The key consideration, however, is to what extent this larger scale infrastructure is necessary to support the build-out of PC52. In particular, does the plan change rely on funding attached to currently unfunded projects, and particularly the improvements to Great South Road to operate an FTN, in order to mitigate its transport effects.
- 75. This is discussed mainly in section 8.3.1 of this report in relation to transport effects. The Transport Assessment ('TA') supporting PC52 has found that the trips generated by the proposal can be accommodated on the immediate network whilst maintaining an acceptable level of service. Flow, on behalf of Council, has reviewed with the applicant's TA and supports its methodology and findings.
- 76. However, as discussed in section 8.3.1 of this report, funding for off-site infrastructure would ideally be resolved in order to address the cumulative effects of PC52 and similar urban expansions. In addition, there will likely be effects arising from a low uptake of public transport and as a result greater greenhouse gas emissions prior to the more substantial transport improvements being delivered.
- 77. The local development infrastructure required to support the immediate network is discussed in detail in section 8.3.2 of this report. In essence, precinct provisions are recommended to provide greater certainty that transport improvements are provided as part of subdivision and development of the PC52 site.
- 78. There is sufficient additional infrastructure to support PC52. As outlined in Section 8.6 of this report, the proposal meets the criteria of the Auckland Council Open Space Provision Policy 2016 in terms of access to suburb and neighbourhood parks. In relation to community infrastructure¹⁰, the DOSP is supported by a topic paper¹¹ that identifies community facilities available in Drury and Papakura, including a community hall and

⁹ As per September 2020 project update by Waka Kotahi NZ Transport Agency <https://nzta.govt.nz/assets/projects/mill-road/mill-road-project-update-newsletter-202009.pdf>

¹⁰ In accordance with the Local Government Act 2002 definition (s 197)

¹¹ Auckland Council (2019) *Drury – Opāheke Structure Plan: Community Facilities*, prepared by Liz Ennor (Policy Analyst, Community Policy)

library in both Papakura and Drury centres, the Papakura Leisure Centre (gym and indoor stadium/courts) and the Papakura Art Gallery.

79. Therefore, in my view the plan change is sufficiently integrated with infrastructure planning and funding decisions, in that it is supported by adequate infrastructure.

Responsiveness to proposals adding significant capacity

80. Objective 6 of the NPS-UD seeks that local authority decisions on urban development are responsive, particularly to proposals that would supply significant development capacity. Policy 8 of the NPS-UD outlines that such decisions should be responsive to plan changes that would add significant development capacity and provide for well-functioning urban environments, even when the capacity is unanticipated by RMA documents, or out-of-sequence with planned land release.
81. 'Significant development capacity' is not defined within the NPS-UD and therefore it is unclear where this 'significant' threshold lies. In my view, PC52 is unlikely to meet this threshold, based on my interpretation of this term, as it is relatively small scale both in terms of land (4.6ha) and the expected yield of around 113 dwellings.

Capacity for housing development

82. Clause 3.2 of the NPS-UD requires local authorities to provide at least sufficient development capacity for housing in the short, medium and long term. PC52 as proposed would contribute to the supply of housing in Auckland within the short-term. Therefore, the plan change will not create a shortfall of capacity within the short, medium or long term horizons identified by the NPS-UD.
83. In addition, the early staging of urban development compared with the FULSS, as proposed by PC52, may to an extent contribute to short term housing capacity by expediting development. This is because:
- a) The most recent Housing and Business Assessment ('HBA') prepared by Auckland Council in 2017¹² finds that there is sufficient feasible capacity in the short and medium term horizons but not the long term.
 - b) However, an assessment of approved resource consents for dwellings, undertaken by Council's Research, Investigations and Monitoring Unit, finds that a relatively low amount of residential development has occurred in the southern growth areas compared with the FULSS staging.
 - c) In addition, the HBA was prepared in 2017 and therefore may present an outdated view of the housing market. The extent of actual realised supply may have been affected by various constraints such as the cost of new infrastructure, the availability of tradespeople, the supply of building materials, and the effect of the Covid-19 pandemic¹³ on construction activity.

¹² Auckland Council (2017) *National Policy Statement on Urban Development Capacity 2016: Housing and business development capacity assessment for Auckland*

¹³ Although recent economic reporting by Auckland Council finds that dwellings consented in Auckland in 2020 "closed 2020 at a record high of \$16,592 (an 11% increase in 2020)" <https://www.aucklandcouncil.govt.nz/about-auckland-council/business-in-auckland/docsoccasionalpapers/auckland-economic-quarterly-february-2021.pdf>

Climate Change

84. The urban growth enabled by PC52 will potentially result in greater greenhouse gas emissions in the short term. However, the eventual availability of public transport and active modes will enable a more efficient land use system that results in fewer emissions per capita compared with urban development not served by public transport. This is discussed further in section 8.3.1 of this report in relation to transport effects.
85. The PC52 site is not close to the coastal marine area, nor is it subject to identified coastal inundation (plus sea level rise) constraints, and therefore is considered to be resilient to the effects of climate change

Conclusion

86. In my view PC52 will give effect to the NPS-UD as required by s75(3)(a) of the RMA as it provides for well-functioning urban environments, aligns with the future built environment as expressed by the DOSP, is sufficiently integrated with infrastructure planning and funding decisions, and provides for housing supply to be expedited.

4.2.2 National Policy Statement on Freshwater Management 2020 ('NPS-FM')

87. The NPS-FM seeks that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater ecosystems, the health needs of people, and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
88. In my view, PC52 as proposed will not give effect to the NPS-FM. As discussed in section 10 of this report, the PC52 provisions as proposed do not require the SMP recommendations on water quantity and quality to be implemented (see sections 10 and 18 of this report). Therefore in my view, PC52 as proposed will not provide for:
 - a) Te Mana o te Wai (fundamental NPS-FM concept and Policy 1) and active involvement by tangata whenua (Policy 2), given that Ngāti Te Ata Waiohua and Ngāti Tamaoho have submitted in opposition to the plan change (although they have been involved in hui and have provided feedback on the applicant's SMP). This is address further in section 14 of this report.
 - b) Freshwater management in an integrated way that considers the effects of use and development of land on a whole-of-catchment basis, including on receiving environments (Policy 3), as the hydrological and quality mitigations identified in the SMP are not required to be implemented by the proposed provisions, and therefore may not mitigate adverse effects on the receiving environments of Slippery Creek and Drury Creek.
89. However, PC52 gives effect to other parts of the NPS-FM:
 - a) The plan change does not require or compel the loss of river extent and values (Policy 7). It is noted that the resource consent for 520 Great South Road proposes to reclaim and pipe some length of the stream on site, and to daylight a remaining portion of the stream in accordance with SEV¹⁴ offsetting. This is however not sought through the PC52 provisions.
 - b) No inland wetlands are identified on the site (Policy 6).

¹⁴ Stream ecological valuation

90. However, I consider that the PC52 provisions, as proposed to be modified by applying the SMAF 1 control and precinct provisions to manage stormwater quality and quantity in **Appendix 6** to this report, will give effect to the NPS-FM. This is discussed further in section 10 and 18 of this report

4.3 National environmental standards or regulations

91. Under section 44A of the RMA, local authorities must observe national environmental standards in its district / region. No rule or provision may be duplicated or in conflict with a national environmental standard or regulation.

4.3.1 Resource Management (National Environment Standards for Freshwater) Regulations 2020 (NES-FM)

92. The NES-FM regulates activities that pose risks to the health of freshwater and freshwater ecosystems. This includes standards for farming activities and activities that affect freshwater systems and in particular wetlands. No wetlands are identified on the site, and as a result of the plan change the site will not be farmed. No proposed provisions are considered to be duplicated or in conflict with the NES-FM.

4.4 Auckland Unitary Plan

93. Section 75(3)(c) of the RMA requires that a district plan must give effect to any regional policy statement. Section 75(4)(b) of the RMA requires that a district plan must not be inconsistent with a regional plan for any matter specified in s 30(1) RMA.

Table 1: AUP(OP) matters relevant to PC52

Relevant Act/ Policy/ Plan	Section	Matters
Regional Policy Statement	B2.2	Urban growth and form
Regional Policy Statement	B2.3	A quality built environment
Regional Policy Statement	B2.4	Residential growth
Regional Policy Statement	B2.7	Open space and recreational facilities
Regional Policy Statement	B3.3	Transport
Regional Policy Statement	B7.3	Freshwater systems
Regional Policy Statement	B10.2	Natural hazards and climate change
Regional Plan	E1	Water quality and integrated management
District Plan	H5	Mixed Housing Urban Zone
District Plan	E27	Transport

Regional Policy Statement

94. The applicant has provided an assessment against the objectives and policies of the AUP(OP) Regional Policy Statement ('RPS') in Section 7.0 of the Private Plan Change Request and Appendix 4 to the application. This assessment finds that PC52 is 'entirely in keeping with the RPS provisions' because:
- A quality residential environment can be achieved, serviced by existing infrastructure, open space and road network (Objective B2.2.1(1))
 - The MHUZ provides for higher residential intensification near to the Drury Village and future Drury Centre identified in the DOSP, and the Papakura Centre. Both centres can be accessed via established public transport (Policy B2.2.2(5) and (7))
 - The application of the MHUZ will result in a quality residential environment, and is likely to support an improvement in the amenity and safety of the neighbourhood compared with the existing situation (Objective B2.3.1(1))
 - The rezoning to MHUZ supports a quality compact urban form (B2.4.1(1)), offers the potential for a greater range of housing types and greater housing choice in an accessible location (B2.4.1(4))
 - The recreational needs of people and communities will be met, as that PC52 is consistent with the Council's Open Space Provisions Policy 2016 given the presence of a suburban park (Opāheke Reserve) and neighbourhood park (Parkhaven Drive reserve) proximate to the PC52 site (B2.7)
 - The Plan Change has been informed by a transport assessment which shows that the surrounding road network can operate safely and efficiently with the rezoning in place. Additionally, there is existing public transport serving the site and development of the site would not preclude any future transport upgrades (B3.3 Transport)
 - The adverse effects of the Plan Change on the freshwater systems will be less than minor given the small scale of the site relative to the wider catchment. Specific mitigation measures to treat stormwater runoff are required under the Auckland-wide provisions and will be considered as part of a future resource consent process via the certification requirements of the Council's regional NDC (B7.3 Freshwater systems)
 - Specific mitigation measures to natural hazard risk from flooding are required under the Aucklandwide provisions and will be considered as part of a future resource consent process (B10.2 Natural hazards and climate change)
95. I agree with these findings, except those in relation to B7.3 Freshwater as I consider that the PC52 provisions as proposed do not require the SMP recommendations on water quantity and quality to be implemented. In my view, the application of the SMAF 1 control and precinct provisions to manage stormwater quality and quantity, as outlined in **Appendix 6** to this report, will give effect to the RPS. This is discussed in sections 10 and 18 of this report.
96. In addition, I consider that additional commentary is required on Chapter B3.3 Transport and in particular B3.3.2(5) in relation to the integration of land use and transport. Overall, I am satisfied that PC52, as proposed to be modified in this report (refer to sections 8 and 18), will give effect to these objectives and policies. The proposal (as modified), will be adequately integrated with the planning, funding and staging of urban growth (B3.3.2(5)(a)), because:

- a) As outlined in section 8.3.1, ideally the larger scale transport improvements identified by SGA would be in place or funded to manage effects from cumulative urban expansions. However, PC52 is small in scale and served by existing public transport, that supports the early staging of the plan change.
 - b) As outlined in section 8.3.2, precinct provisions requiring localised improvements to be delivered are recommended. In my view, these provisions will ensure that transport infrastructure will be delivered to integrate with urban growth.
97. Once the wider improvements identified by SGA for the Drury area are delivered, the land use pattern proposed by PC52 will in my view support PT, walking and cycling to reduce the growth in demand for private vehicle trips (B3.3.2(5)(b)) as it will be proximate to the Great North Road FTN, connecting to the Papakura and Drury Central railway stations.

Regional Plan

98. With regard to s 30(1) RMA matters, in my view the primary regional plan matter for PC52 is water quality and integrated management, outlined in Chapter E1 of the AUP(OP). This seeks that freshwater and sediment quality is either maintained, or progressively improved over time, and that the mauri of freshwater is maintained or progressively improved over time.
99. In my view, the plan change as proposed does not support freshwater quality being maintained, as the proposed provisions do not require water quantity and quality effects to be mitigated in accordance with the SMP recommendations. In my view the application of the SMAF 1 and precinct provisions will more effectively achieve integrated management and the maintenance and improvement of freshwater values. This is outlined further in sections 10 and 18 of this report.

4.5 Any relevant management plans and strategies prepared under any other Act

100. Section 74(2)(b)(i) of the RMA requires that, in considering a plan change, a territorial authority must have regard to management plans and strategies prepared under other Acts.

4.5.1 Auckland Plan 2050

101. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that council should have regard to in considering PC52, pursuant to section 74(2)(b)(i) of the RMA.

Table 1: Auckland Plan matters relevant to PC52

Section	Matters
Outcome: Homes and Places	Direction 1: Develop a quality compact urban form to accommodate Auckland’s growth Direction 1: Accelerate the construction of homes that meet Aucklanders’ changing needs and preferences Direction 4: Provide sufficient public places and spaces that are inclusive, accessible and contribute to urban living

Outcome: Transport and Access	Direction 1: Better connect people, places, goods and services Direction 2: Increase genuine travel choices for a healthy, vibrant and equitable Auckland Direction 3: Maximise safety and environmental protection Focus area 1: Make better use of existing transport networks Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders Focus area 5: Better integrate land-use and transport decisions
Development Strategy	Future Auckland Managed expansion into future urban areas Anticipated growth - where and when

Auckland Plan

102. I consider that PC52 is consistent with the outcomes set in the Auckland Plan, because:

a) In relation to Homes and Places:

- i) The plan change supports a compact urban form as expressed in the Development Strategy, which includes managed expansion into Future Urban areas.
- ii) The plan change supports accelerating the construction of homes by onboarding housing capacity prior to its staged release.
- iii) The proposed MHUZ supports a range of housing typologies including detached, terraced housing and walk up apartments which allows development to respond to future housing needs/preferences.
- iv) The provision of and access to public places is discussed in section 13 of this report in relation to open space.

b) In relation to Transport and access:

- i) Direction 1 primarily relates to the design of the transport network, which is not proposed through PC52.
- ii) PC52 supports Direction 2 and Focus Area 4 to a limited extent in the short term, given that only limited public transport services and walking/cycling infrastructure are currently available to serve the site. However, in the medium and long term, improvements to bus services and cycling connectivity on Great South Road will provide enhanced connections to the Papakura and future Drury Central train stations.
- iii) In relation to Focus Area 5, the integration of land-use and transport decision is discussed in section 4.2.1 in relation to the NPS-UD. This concludes that there is adequate integration between PC52 and the transport funding and delivery programmes applicable to the Drury area, taking into account that only small-scale, local improvements are required to support the scale of development sought through this plan change.

Development strategy

103. The Development Strategy promotes a quality compact approach to growth and development in Auckland. Broadly speaking, this means that most growth will occur in existing areas rather than rural areas; and in places accessible to PT and active transport, within walking distance to centres, employment and other amenities, and in a manner that maximises the efficient use and is supported by necessary infrastructure at the right place and time.
104. The Development Strategy primarily seeks to achieve this by:
- a) Sequencing what gets delivered, including directing planning and investment to areas where the greatest development capacity is taken up;
 - b) Aligning the timing of infrastructure provision with development, particularly by identifying the timing and location of expansions to infrastructure networks in future urban areas; and
 - c) Ensuring there is an ongoing supply of development capacity to meet demand as defined by the National Policy Statement on Urban Development Capacity¹⁵, including in the short, medium and long term.
105. As part of the Development Strategy, the plan provides for managed expansion into future urban areas, and identifies future urban areas consistent with the FUZ in the AUP(OP). The section '*Anticipated growth - where and when*' sets out the sequencing of Future Urban land identified within the Auckland Plan, which formalises the staging set out in the FULSS. The Auckland Plan identifies the Drury-Opāheke area as being development ready by 2028 – 2032, consistent with the FULSS.
106. In having regard to the Development Strategy within the Auckland Plan, in my view the key considerations are:
- a) Whether there is sufficient capacity for housing in the short, medium and long term as defined by the NPS-UD, and whether PC52 would contribute to addressing a shortfall in development capacity.
 - b) Whether the early release of land for urban development compared with the Auckland Plan and FULSS sequencing will be supported by infrastructure provision, and whether this is consistent with the broader directions set by the Development Strategy for urban growth.
107. I consider that PC52 is consistent with the Auckland Plan development strategy because:
- a) PC52 will make a contribution towards housing capacity as defined in the NPS-UD timeframes, by expediting house construction through the early release of future urban land.
 - b) Contextual factors support the expediting of additional housing capacity, as outlined in section 4.2.1 in relation to the NPS-UD.
 - c) As outlined in section 4.2.1 of this report, PC52 is to an extent integrated with infrastructure delivery. Section 8.3.1 of this report outlines that ideally the funding for large scale transport projects in Drury would be resolved to mitigate the potential effects of cumulative urban expansions. However, on balance the early urbanisation

¹⁵ Brought forward into the NPS-UD

of PC52 is supported by adequate current and planned infrastructure. Section 11 outlines that further modelling to demonstrate water supply capacity is required to understand whether the current network is sufficient to mitigate the effects of PC52.

108. In my view, PC52 is consistent with the directives of the Auckland Plan, including the outcomes sought in regard to homes and places, and transport and access, and the quality compact urban form sought within the development strategy.

4.5.2 Long-Term Plan 2018-2028

109. The Long-Term Plan 2018-2028 ('LTP'), prepared under section 93 of the Local Government Act 2002, outlines Auckland Council's funding and investment decisions over a ten year period. This includes indicative funding within a long term horizon of 30 years.

110. Of relevance to PC52, the Long-Term Plan identifies investment in:

- New growth roading projects in the north and south (\$360m). This includes NZTA projects a) SH1 improvements from Manukau to Bombay and b) new road connections to the Pukekohe growth area.
- Expansion of the electric rail fleet (\$509m within 2018-2028), including from Papakura to Pukekohe (identified as 2018-2028)
- Augmentation of the Southern Interceptor, primarily within 2019-2028 (\$2.125b)

111. The upgrade of Great North Road to an FTN standard is not identified in the LTP. This is discussed in section 8.3.1 of this report in relation to transport effects. The expansion of the electric rail fleet for the Papakura to Pukekohe extension, in concert with the Drury Central station will ultimately improve access to public transport. In relation to the augmentation of the Southern Interceptor, the public reticulated wastewater network extends to the PC 52 site, and therefore the plan change is not reliant on the extension of this bulk network for wastewater servicing.

4.5.3 Regional Land Transport Plan 2018

112. The Regional Land Transport Plan ('RLTP'), prepared under section 13 of the Land Transport Management Act 2003, sets out the transport priorities and capital investment programme for Auckland over a 10 year horizon.

113. The RLTP 2018-2028 identifies committed, funded and unfunded projects. Key projects of relevance to PC52 are the purchase of new EMU's to support the Papakura to Pukekohe rail electrification (\$134.4m, committed), Papakura Station Park-and-Ride (11.7m, funded) Mill Road Corridor phase 1 (\$494m, funded), Mill Road Southern (Alfriston to Drury South (699m, unfunded)) Southern Rail Stations (\$77.9m unfunded), and FTN/RTN Manukau to Drury – a high frequency bus corridor connecting Drury West, Drury, Hingaia, Papakura, Takanini and Manukau (\$64.8m, unfunded).

114. The draft RLTP 2021-2031 identifies a similar funding programme, triaged into committed and essential, prioritised, and requires funding categories. The primary changes from the 2018 RLTP are:

- a) The Mill Road corridor and Southern Stations are now funded by NZUP
- b) The Manukau to Drury FTN/RTN is no longer identified
- c) The Papakura Station Park-and-Ride funding is now 'committed and essential' rather than 'funded' and due to be completed by 2024/2025.

115. The integration of PC52 with funding decisions outlined in the RLTP is discussed in section 8.3.1 of this report.

4.6 Non-statutory plans and strategies

4.6.1 Future Urban Land Supply Strategy (FULSS)

116. The FULSS is described in Section 2 of this report, and has been assessed with respect to staging in Section 6.6.1 of this report in relation to the Auckland Plan.

117. In addition, the FULSS also sets out principles that are not referenced within the Auckland Plan. Of particular relevance is Appendix 2 which outlines specific reasons to support sequencing on a sub-regional basis. The reasons identified for sequencing of the Hingaia, Opāheke-Drury and Drury West areas are that

- Bulk infrastructure is required to service the wider area, including augmenting the Southern and Southwestern wastewater interceptors
- The Opāheke area is subject to complex flooding issues, which need to be resolved through comprehensive catchment-wide and potentially cross-catchment solutions, in combination with development of wastewater infrastructure¹⁶.

118. The DOSP has identified indicative bulk water supply and wastewater networks¹⁷ to support growth in the structure plan area. No components of the indicative networks are aligned over the PC52 land. As discussed in section 11 of this report, reticulated water and wastewater networks currently extend to the site or site frontage, and as discussed in relation to Veolia's submission, there is likely to be capacity within the network to service the anticipated level of development. This is however subject to further evidence to demonstrate water supply capacity being provided by the applicant (refer to section 11 of this report).

119. Flooding constraints are identified across a substantial extent of Opāheke. However, these flood plains are primarily on land west and southwest of the PC52 site, within Otūwairoa / Slippery Creek and its surrounds. The PC52 site itself is bisected by an overland flow path and stream but no flood plains are identified on the site.

4.6.2 Manurewa-Takanini-Papakura Integrated Area Plan 2018 ('MTPIAP')

120. The MTPIAP is a 30 year strategic document that outlines an urban vision for the Manurewa, Takanini and Papakura. In relation to Papakura, the MTPIAP seeks to '*support Papakura as an emerging metropolitan centre and reposition the centre to enable a diversified retail, commercial, and residential offering*'. A number of projects are identified within Papakura to achieve this outcome, primarily related to enhancing public space, promoting pedestrian and cycle networks, enhancing access to the train station, managing car parking more effectively, and advocating for residential intensification around the town centre.

121. The improvements sought to the Papakura Centre through the MTPIAP in my view support the urbanisation of PC52 by providing better pedestrian and cycling connectivity and safety

¹⁶ p.32, Appendix 2, Future Urban Land Supply Strategy <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/housing-plans/Documents/future-urban-land-supply-strategy.pdf>

¹⁷ p.58-59, Drury-Opāheke Structure Plan

through the centre. The position of the plan to advocate for quality residential intensification around the Papakura Centre aligns strongly with the intent of PC52.

4.6.3 Papakura Local Board Plan 2020

122. The Papakura Local Board Plan identifies five outcomes for Papakura, each supported by objectives and key initiatives. Of particular relevance to PC52 are Outcomes 2, 3 and 4:

- Outcome 2 relates to a diverse community where people lead active, healthy lives. A key objective is that Papakura's parks, sports and recreation facilities are well used. PC52 will eventually support this by locating residents within a walkable distance to the Opāheke Reserve and the neighbourhood park on Parkhaven Road. However, it is noted that a direct connection to Opāheke Reserve relies on the formation of Gatland Road through future plan changes (refer section 13 of this report). Papakura Centre, located 3km north of the site, provides for other recreation facilities, including the Papakura Leisure Centre.
- Outcome 3 relates to improved transport connectivity and primarily seeks to improve cycleways, walkways and public transport in Papakura. PC52 will, in the medium and long term, support the uptake of active travel modes, particularly once Great South Road is upgraded to an FTN standard. PC52 will also provide for enhance pedestrian connectivity from the site to the footpaths on the western side of Great South Road.
- Outcome 4 relates to a treasured environment and heritage, and seeks to enhance enjoyment of harbours and streams, and improvements to the quality of air and water. PC52 will be consistent with these objectives, particularly in terms of the quality and quantity of stormwater being discharged to Slippery Creek / Otūwairoa.

4.6.4 Papakura Greenways Local Paths Plan 2016

123. The Papakura Greenways plan is a long-term strategic plan to 'greatly improve walking, cycling and ecological connections' within the local board area, connecting with greenways identified by other local boards in Auckland. The plan identifies proposed greenway connections, in terms of both long-term aspirational greenways, and proposed priority routes to be delivered and or/advocated for over the next 3-5 years. Gatland Road is identified as a proposed greenway route connecting Parkhaven Drive and Great South Road with the Opāheke Reserve, including routes south along the Slippery Creek esplanade. It is however not designated as a priority route.

124. PC52 if approved will occur ahead of this greenway connection being delivered. This will affect walking connections from the site to Opāheke Reserve, as Gatland Road east of the plan change site is currently unformed. This is discussed further in section 13.1 of this report.

4.7 Section 32 evaluation

125. Section 74 requires that district plan change must have particular regard to an evaluation report prepared in accordance with Section 32 RMA.

126. Section 32 requires an evaluation report examining the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act; and whether the provisions are the most appropriate way of achieving the objectives of the AUP(OP).

127. The applicant has prepared an assessment against Section 32 to demonstrate that the provisions are the most appropriate way to achieve the objectives of the PPC and district plan and achieve the purpose of the RMA. This is contained in Section 9.0 of the Plan Change Request. Some of the key observations are:

- An assessment of objectives of PC52 against Part 2 of the RMA under Section 32(1)(a) RMA finds that the plan change would be consistent with section 5-8 of the Act, particularly in regard to the efficient use and development natural and physical resources¹⁸ the maintenance and enhancement of amenity values¹⁹ and the maintenance and enhancement of the quality of the environment²⁰
 - An assessment of the provisions to achieve these objectives under Section 32(2) has been split into separate options assessments for the land use zoning selection and the timing/sequencing of the plan change.
 - In respect of land use zoning, the assessment compares rezoning to Mixed Housing Suburban with rezoning to MHUZ. The MHUZ is preferred as it makes better use of existing public transport and amenities, and committed transport infrastructure through NZUP, offers potential for a greater range of housing choice, better responds to the future planned built form of the area, and contains provisions to manage amenity effects at the interface with existing housing.
 - In terms of timing and sequencing, the assessment explores a do nothing option, rezoning in accordance with the structure plan timeframes (2028-2032 stage), or the proposed plan change (urbanise the land ahead of the planned sequencing). The assessment finds that the proposed plan change is the most appropriate, given the site is contiguous to an existing urban area and infrastructure networks, and would bring forward the release of land for much needed housing capacity in the short term.
128. I agree with the observations of the Section 32 evaluation report. However, in my view the Section 32 evaluation does not adequately evaluate stormwater management or the delivery transport infrastructure to support urban growth. As such I do not consider that the proposed provisions are the most appropriate to achieve the objectives of the AUP(OP) and the purpose of the RMA.
129. Instead, I consider that PC52 should be modified to apply the SMAF 1 control and precinct provisions to the site. An evaluation of the changes pursuant to Section 32AA RMA is provided in section 18 to this report, which finds that the proposed changes are the most appropriate way to achieve the objectives of the AUP(OP) and the purpose of the RMA.

5. CONSULTATION

5.1 Mana Whenua

130. The applicant advises in Section 6.3 of the Plan Change Request that ‘all of the iwi who have an interest within the area were contacted regarding the Plan Change proposal to see if they wished to engage’. The following iwi groups expressed an interest in the proposal:
- Ngāti Te Ata Waiohū;
 - Ngāi Tai ki Tamaki;
 - Ngāti Tamaoho.

¹⁸ s 7(b)

¹⁹ s 7(c)

²⁰ s 7(f)

131. With regard to these iwi groups, the applicant advises that:

A hui on-site was undertaken on 8 July 2019. The Iwi confirmed that they did not have issues with the rezoning proposal but would like to engage further as the development progresses.

132. The applicant has also advised of the wider iwi authorities consulted in preparing the plan change. In addition to the iwi groups that engaged in the hui, the applicant sent the proposed zoning and a high level opportunities and constraints analysis to:

- Ngāti Maru
- Te Ahiwaru - Waiohua
- Waikato - Tainui
- Te Ākitai Waiohua

The iwi groups consulted with are consistent with the mana whenua groups relevant to the site identified using council's online tool²¹.

5.2 Local boards

133. The Papakura Local Board were advised of the plan change request and invited to provide their views on the plan change on 24 March 2021 at a Local Board Meeting.

134. **Table 3** below reports on the minutes of the Local Board meeting²² and the views of the reporting planner and technical specialists (where relevant)

Table 3: Assessment of Local Board Comments

Matter	Local Board Comments	Assessment
Council ability to provide infrastructure for development	i) The local board believe the land should be released for development in line with Auckland Council's Future Urban Land Supply Strategy to ensure council can manage the costs associated with the development of infrastructure to support growth. The local board has an advocacy point in the Local Board Plan 2020 regarding infrastructure to be in place before development happens.	<p>The FULSS guides the release of future urban land for urban development. Private plan changes to urbanise land ahead of the FULSS sequencing must be considered on their merits.</p> <p>The primary infrastructure required to support development in the area is improvements to the transport network – including upgrade to Great South Road to a FTN, rail electrification to Pukekohe, and new Drury train stations.</p> <p>The sufficiency of infrastructure to support PC52 is discussed primarily in sections 8.3.1 and 11 of this report in relation to an</p>

²¹ <https://www.aucklandcouncil.govt.nz/building-and-consents/resource-consents/prepare-resource-consent-application/Pages/find-hapu-iwi-contacts-for-your-area.aspx>

²² Item 15, Resolution number PPK/2021/31
https://infocouncil.aucklandcouncil.govt.nz/Open/2021/03/PPK_20210324_MIN_10472.PDF

		assessment of transport and water supply/wastewater effects.
Wider view of development in the immediate area	<p>ii) The Local Board Plan 2020 contains a number of advocacy points pertaining to planning for good community outcomes as intensification occurs, including the following points:</p> <ul style="list-style-type: none"> • The provision of greenspace within or nearby intensive developments • A reduction in the threshold criteria for walking distances to local parks or reserves • Provision of onsite parking • Provision of visitor on street parking • Road widths that allow access for public transport, utility and emergency vehicles • Provision of shared pedestrian / cycleways. <p>iii) A holistic approach is needed in line with the Opāheke Structure Plan.</p> <p>iv) This is an intensive green fields development that will change the amenity of the immediate area.</p>	<p>The Papakura Local Board Plan is assessed in Section 6.7.3 of this report. In relation to the specific matters raised by the Local Board:</p> <ul style="list-style-type: none"> • The site is served by a neighbourhood park (at Parkhaven Road/Drumkeen place) and suburb park (Opāheke Reserve - although this is not currently walkable from the site – see section 13 of this report) • Onsite and visitor car parking, road widths and shared pedestrian/cycleway facilities is discussed below in this section • The alignment with the DOSP (and discussion on an integrated approach) is discussed in section 9.1 of this report on urban design effects • I agree that medium density residential development enabled by PC52 will change the amenity of the immediate area. The NPS-UD clearly recognises that changes in amenity are not necessarily an adverse effect. I consider that development of the PC52 site could make a positive change in amenity values in the immediate area.
Green Space / Play Space	<p>v) This will be an intensive development with minimal outside play area for the children within the residential sites. It is likely many children will live in this development.</p> <p>vi) Although Opāheke Reserve is reasonably close as the “crow flies”, crossing Slippery Creek is a significant barrier to access, meaning people would have to travel 4-5kms to access that park.</p> <p>vii) Ensure there is close by green space where children have an area to kick a ball around and utilize play equipment.</p> <p>viii) The local board has an expectation that the developer would provide reserve area that includes</p>	<p>The demand for open space is discussed in section 13 of this report. In summary:</p> <p>I understand from Ms Richards that the plan change meets the Auckland Council Parks and Open Space Acquisition Policy 2013, and therefore no additional open space is required within the plan change boundaries.</p> <p>With respect to an area for children to kick a ball, Parkhaven Reserve is a neighbourhood park within 400m of the subject site, with sufficient flat ‘kick a ball’ land.</p> <p>In their transport review, Flow has identified the need for a pedestrian crossing facility on Great South Road, near the Road 1 vehicle crossing. Mr Colins has also supported investigating lowering the</p>

	<p>multi-generational opportunities such as adult fitness equipment or exercise stations as well as play equipment as it is not close to any other facilities. This reflects the Local Board Plan 2020 advocacy point relating to developers funding the development of playgrounds in line with council standards.</p> <p>ix) The traffic on Great South Road is a significant safety barrier to accessing the Park Haven Reserve.</p> <p>x) Ensure there is a green space for a community garden that has room for a shed for storage of community tools.</p> <p>xi) The board does not consider the Gatland Road Cemetery to be an open space for recreation purposes.</p> <p>xii) The board has received advice that the tree canopy in Papakura is sitting below the region's average at 13 per cent. The Local Board Plan 2020 details an initiative supporting the Urban Ngahere programme (increasing the tree coverage and creating vegetation corridors for native bird flight paths). The board would like to see significant planting of trees to support this initiative within this development.</p>	<p>70km/h speed limit along this stretch of Great South Road. These measures together would provide for safe pedestrian access from the PC52 site to Parkhaven Reserve.</p>
Connectivity	<p>xiii) Plan for accessibility to Opāheke Reserve.</p> <p>xiv) Connectivity to the Bellfield development should be taken into consideration, including the provision of shared pedestrian / cycleways.</p>	<p>Connectivity to the Bellfield development will be contingent on achieving road and/or pedestrian and cycle connections through the Plan Change 58 (470 and 476 Great South Road and 2 and 8 Gatland Road) site.</p> <p>This in my view cannot be achieved through PC52, but should be an express consideration of PC58 to the AUP(OP).</p>
Parking and road widths	<p>xv) The board has concerns about the lack of off-street parking in new developments in general. The design of a development needs to allow for onsite parking for each lot to minimize cars that will be parking on the berms as there is nowhere else to park.</p> <p>xvi) The nearest supermarket is in Papakura, therefore is it logical to expect that each housing unit in the</p>	<p><u>Off-street car parking (xv - xvi)</u></p> <p>PC52 proposes to apply to the MHUZ parking requirements, outlined in Chapter E27 of the AUP(OP). The MHUZ parking requirements are very similar to those contained in the Mixed Housing</p>

	<p>proposed development will have a minimum of two cars.</p> <p>xvii) A minimum of two onsite parking spaces for every unit should be a requirement in the consent conditions.</p> <p>xviii) On street visitor parking should also be made available and be a required in the consenting process.</p> <p>xix) The board has fielded complaints from other subdivisions in relation to narrow road widths and the inability for emergency and service vehicles to access. There are already issues within the Addison development with narrow roads not being wide enough for emergency vehicles or rubbish trucks to enter. The Police have also approached the board about this issue.</p> <p>Please ensure input on this development is sought from the fire, ambulance and police services. The services have complained to the board in the past about the narrow widths of new subdivision roads.</p> <p>xxi) The board supports the submitters' requests for traffic treatments relating to the development. Great South Road is a busy road. This development will add to the traffic volumes. The right hand turn on to Great South Road from the "new road" and the Gatland Road intersections will be dangerous. It will also be dangerous to turn right into the "new road" and Gatland Road. The "new road" or the Gatland Road intersection may need some sort of treatment to slow the Great South Road traffic to make it safer for traffic to turn right.</p> <p>xxii) Traffic calming measures should be required as part of the "new road" development to slow traffic down as it could become a "rat run" from Gatland Road to Great South Road going south.</p> <p>xxiii) Consideration should also be given to the impact of the work about to begin on the third lane on the State</p>	<p>Suburban, which predominates the surrounding Rosehill area²³.</p> <p>With this in mind, Flow has reviewed the PLB views and considers that there is no reason why a higher parking rate is required for this site compared with the surrounding area.</p> <p>I agree with Flow, and note that the 520 Great South Road resource consent proposes 2 parking spaces per dwelling across roughly half the proposed typologies.</p> <p><u>Road corridor elements/design (xvii – xix, xxii)</u></p> <p>Flow advises that the width and design of new roads is subject to AT's Traffic Design Manual during resource consent and Engineering Plan Approval Stages. This includes on-street car parking, street widths and traffic calming measures. With regard to the Addison development, Flow notes that this is a broader discussion between AT, AC and emergency services and should be resolved through AT standards and guidelines rather than this plan change.</p> <p>I agree with Flow, and note that for recent plan changes AT have not supported standards specifying road cross-sections or corridor widths, given the potential for conflict with the TDM.</p> <p><u>Right turn bay safety concerns (xxi)</u></p> <p>Flow is satisfied that right turn movements from Great South Road to Road 1 within the PC52 site can be safely accommodated</p> <p>In respect of the Great South Road / Gatland Road intersection, Flow acknowledges the existing sight distance shortfall arising from street trees on Great South Road, and recommends that this be addressed through resource consenting processes.</p> <p><u>Diversion of traffic from SH1 during construction (xxii)</u></p> <p>Flow considers that there is a large amount of capacity available at the Great</p>
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²³ Particularly for dwellings with two or more bedrooms, for which one car parking space is required

	<p>Highway One Motorway from Papakura to Drury as traffic will be diverted on to Great South Road to allow work to continue on the motorway. Presumption that people will use public transport</p> <p>xxiv) While current thinking is everyone should be using public transport (PT), the reality is that the PT option does not work for everyone. PT does not necessarily run near where the people need it to go or within the timeframes people need it. Even if they can take public transport to work, they still need to have vehicles for the weekly shopping accessing medical services and visiting friends or relatives.</p>	<p>South Road / Gatland Road and Great South Road / Road 1 intersections, which could accommodate traffic diverted from SH1 during construction of the Papakura to Bombay improvements.</p> <p><u>Public transport uptake assumptions (xxiv)</u></p> <p>Flow advises that the Transport Assessments has made appropriate trip generation assumptions, which account for a scenario with higher private vehicle use and lower public transport uptake.</p>
Public transport	<p>xxv) Public transport options need to be available nearby so people can get to where they need to go. The public transport services need to adequately cater to the population including the elderly, ie: a kneeling bus.</p>	<p>The current and future level of public transport service is assessed in Section 8.1 on this report. The 376 bus currently services Great South Road every half hour in peak times, connecting with the Papakura Train Station. This frequency is planned (under the RLTP) to increase to every 15/20 mins at peak times by 2028.</p> <p>The actual facilities of the bus stock is in my view a matter for AT to resolve through their own asset renewal programmes.</p>
Mana whenua input	<p>xxvi) Consultation with mana whenua is a requirement under the Act. It is concerning that the Section 32 report advises that iwi were consulted yet there is a submission from Ngāti Te Ata requesting the plan changes be declined on the basis of no iwi consultation.</p> <p>xxvii) The board encourages consultation with mana whenua and implementing recommendations proposed into the design of the development.</p>	<p>It is uncertain whether the Act requires private plan change requestors to consult iwi under Clause 4A to the First Schedule RMA. It is however considered best practice for mana whenua to be consulted prior to lodgement.</p> <p>Nevertheless, the applicant consulted with the iwi groups with an interest in the area prior to lodgement, as discussed in Section 5.1 of this report.</p>
Stormwater	<p>xxviii) The board recommend appropriate stormwater treatments in line with the latest three waters legislation requirements. Although this is a small development in terms of the wider scale proposed for the area. All efforts should be made to retain and</p>	<p>The SMP submitted by the applicant recommends the use rainwater storage / re-use tanks for hydrological mitigation. This approach is supported by Healthy Waters, although additional provisions are considered to be necessary to implement this approach. This addressed further in section 10 of this report.</p>

	<p>treat stormwater to ensure the optimum to the receiving environment.</p> <p>xxix) Rain harvesting and the recycling of stormwater should be a requirement given the latest drought in Tāmaki Makaurau.</p>	
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6. NOTIFICATION AND SUBMISSIONS

135. Details of the notification timeframes and number of submissions received is outlined below:

Date of public notification for submissions	27 August 2020
Closing date for submissions	24 September 2020
Number of submissions received	15
Date of public notification for further submissions	9 October 2020
Closing date for further submissions	23 October
Number of further submissions received	4

136. A summary of decisions requested by submissions, as well as copies of the submissions and further submissions are attached as **Appendix 3** to this report.

Sub no.	Submitter	Matters raised
1	Tingran	Interested in plan change
2	Casey Norris	Property outlook, value, sunlight, drainage and traffic management
3	Jamie Barry Mackenzie	Outlook, sunlight, traffic movements
4	Chris Caldwell	Design of Great South Road / Road 1 intersection
5	Judy and Peter Coleman	Assessing the area as a whole, stormwater effects, effects on the cemetery, traffic effects.
6	Priyanka Hulikoppe	Open space, access to amenities, assessing the area as a whole, open space
7	Julia Marr	Provision of/access to open space, car parking
8	Ngati Te Ata Waiohua	Consultation and engagement with respect to submitter's culture preferences.
9	Lee & Gary Running	Stormwater connections to 9 & 11 Gatland Road
10	Veolia Water Services	Water and wastewater capacity and network design
11	Srini Reddy	Vehicle access to 541 Great South Road

12	Heritage New Zealand Pouhere Taonga	Need for archaeological assessment prior to plan change approval or development
13	Auckland Transport	Alignment with transport infrastructure planning/funding, delivery of frontage upgrades, pedestrian improvements and road widening, internal transport network and future connectivity
14	David and Sarah Bryant	
15	Wainono Investments Limited	Supports the plan change, seeks no additional precinct provisions be applied.

7. ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

137. The applicant has provided an assessment of actual and potential effects on the environment²⁴, pursuant to Clause 22 of Schedule 1 to the RMA.

138. The following sections assess environmental effects relevant to the proposed plan change:

- Transport
- Urban design and form
- Stormwater discharge and diversion
- Water and wastewater infrastructure
- Geotechnical
- Parks and open space
- Mana Whenua
- Historic Heritage

139. Where relevant, submissions have been discussed in relation to an assessment of effects below.

8. TRANSPORT

8.1 Access and sightlines

140. The Transport Assessment ('TA') submitted by the applicant reports that the site has direct access to Great South Road, which represents the obvious choice for establishing the main vehicle access to the south. The TA notes that whilst access could be suitably provided through a Give Way controlled T intersection without any road widening to Great South Road, a painted flush median and right turn pocket is preferred given the importance of Great South Road as arterial road. The road indicated by the applicant extending from Great South Road to Gatland Road is referred to as Road 1 in this report.

141. The TA considers that the paper road located south of the PC52 land is not preferred as an access point due to its proximity with the right turn pocket from Great South Road to Parkhaven Drive.

²⁴ Section 8.0 of the Plan Change Request

142. Flow Transportation Consultants has assessed the plan change for council. Flow supports the location of the proposed Road 1 / Great South Road intersection. Whilst the design and location of this intersection is not proposed through the PC52 provisions, the request demonstrates that safe and efficient access to the site can be established at the resource consent stage
143. Submission 4.1 seeks the delivery of a safety lane on Great South Road adjacent to the plan change land, to enable right turning traffic from the plan change area to merge into the full traffic flow. The submitter considers that Great South Road is already busy, and will become busier, and therefore right turning options will need to become more robust. Flow shares the submitter's safety concerns, but considers that the sea-gull" intersection proposed by the submitter can be unsafe. Flow prefer the right turn bay proposed in the applicant's TA.
144. Submission 11.1 is concerned with the location of the right turn indicated by PC52. The submitter has obtained resource consent for an aged care facility with associated vehicle access, including median, at 541 Great South Road opposite to this proposed intersection. The submitter is concerned that the proposed entry point to 520 Great South Road will obstruct traffic movement into their site, particularly southbound right-turning traffic. AT has further submitted in partial support of the submission, noting that further investigation should be undertaken as part of the plan change into the suitability of the location and/or design of the proposed intersection with Great South Road.
145. Flow has assessed submission 11.1 and further submission 1 on behalf of Council, taking into account the detailed intersection plans for the right turn bay from Great South Road provided in support of the resource consent. Whilst Flow acknowledges the concerns raised by submission 11.1, they consider that a design solution can be achieved by setting the right turn bay back further south and extending the median in its place to ensure that right turns from the median into 541 Great South Road can be achieved without conflict from traffic entering the PC52 site.
146. In my view, the alignment and design of the proposed Great South Road / Road 1 intersection can be assessed and determined through the resource consent process. For the purposes of assessing the plan change, the applicant has demonstrated that safe and efficient access to and from the subject site can be achieved.

Sightlines

147. Flow is concerned with a sightline shortfall at the Great South Road / Gatland Road intersection. The TA identifies that there is restricted visibility for vehicles making a right turn from Gatland Road to Great South Road, and that there is only 70m of sight distance available to drivers making this turn. Using the *Austroads Guide to Road Design Part 3* metrics, Flow identifies minimum sightlines of 150m from Gatland Road looking south along Great South Road. This in Flow's view is a significant concern given the extent of the shortfall in sight distance.
148. Through Clause 23 requests for further information, the applicant has stated that it is working with AT to mitigate these concerns by trimming street trees on the eastern side of the Great South Road reserve, immediately south of Gatland Road. In my view, this can be achieved through the resource consent process to develop 21 Gatland Road. I note that specific provisions (i.e., through a precinct) requiring these trees to be trimmed may not be enforceable, as subsequent conditions of consent would rely on third party approval from AT as the road controlling authority.

8.2 Trip generation

149. The applicant anticipates that the proposed zoning would enable an additional 113 dwellings to be constructed on the site. Based on this yield, the TA finds that the plan change will generate peak hour flows of about 90 vehicles per hour ('vph') and off peak flows of 57 vph. Based on this trip generation, the TA concludes that an acceptable level of service will be maintained on the surrounding network, including the Great South Road / Gatland Road intersection and the proposed Great South Road / Road 1 intersection.
150. Submissions 2.1, 3.1 5.2 and 6.2 express concerns that the development enabled by PC52 would create traffic congestion on Great South Road. Some submitters (3.1, 6.1) are concerned with the noise associated with additional vehicle traffic on Great South Road.
151. Flow considers that the TA has adequately assessed the effects from PC52, including acknowledging the existing limited accessibility to walking, cycling and public transport. Flow advises that whilst additional vehicle movements on Great South Road may be noticeable, "the overall effect to traffic safety and efficiency will be negligible, provided the improvements identified in the TA and our report are implemented with development." These improvements are primarily the localised mitigations at the site frontage, discussed in Section 8.3.2 of this report.
152. Based on the conclusions of the TA and the opinion of Flow, I am satisfied that Great South Road will continue to operate at an acceptable level of efficiency. As outlined in the TA, the vehicle movements anticipated to experience the lowest level of service and therefore the longest delays, will be right turns made from Road 1 of the development to the northbound lane of Great South Road. Existing vehicle movements along Great South Road will only experience a negligible level of additional congestion as a result of the plan change.
153. In relation to road noise, I appreciate that the traffic movements arising from PC52 would contribute to additional road noise on Great South Road. However, this is likely to be a small contributor compared with existing levels of road noise and additional noise arising from further development of the Drury area planned in the DOSP. In addition, the AUP(OP) takes the position of not controlling noise arising from roads or other transport corridors, except noise levels for traffic from new or altered roads²⁵. Under the relevant New Zealand Standards²⁶, altered roads are only those subject to realignment, and therefore would not encompass Great South Road when it is eventually upgraded as an FTN.

8.3 Integration with infrastructure delivery, public transport and staging of PC52

154. The assessment of infrastructure required to support PC52 can be split into two categories:
- a) Off-site infrastructure improvements required to service wider/cumulative growth in Drury-Opāheke; and
 - b) Improvements to the local network adjacent to the subject site

8.3.1 Wider network improvements and staging ahead of the FULSS

155. The applicant's TA assesses the effects of PC52 on the immediate transport environment, and finds that the network, and particularly key intersections, will continue to operate

²⁵ E25.6.33

²⁶ NZS 6806: 2010 Acoustics – Road traffic noise – New and altered roads

satisfactorily during all periods with the development. As such, the TA does not consider that further network improvements are needed to mitigate the effects of the plan change.

156. Submission 13.1 from Auckland Transport opposes the plan change, and raises several concerns on the alignment of the plan change with the FULSS staging and the delivery of transport infrastructure required to support PC52. The key points raised by AT are that:
- a) The submission seeks to ensure that the potential transport related direct and cumulative effects raised by Proposed Private Plan Change 52 are appropriately considered and mitigated
 - b) The FULSS helps to inform the Council's (and CCO's) infrastructure asset planning and funding priorities, and, in turn, enables development capacity to be provided in a coordinated and cost-efficient way via the release of "ready to go" land.
 - c) The lack of alignment between the planned staging and "early release" of the subject site as a key consideration in the assessment of effects associated with the proposal and ensuring that these effects are able to be appropriately mitigated. Auckland Transport considers that effects may arise from this development occurring ahead of the provision of the required transport network improvements.
 - d) The Supporting Growth has identified Great South Road as a proposed future Frequent Transport Network route requiring bus lanes - this is not expected to be required within the next 10 years and so no work has been undertaken to formally confirm what is needed in this part of the arterial corridor or to prepare any notices of requirement. Auckland Transport does not have funding to provide for any required strategic infrastructure or upgrades to support the development of such out of sequence land.
157. Further Submission 4 from Wainono Investments Limited opposes the AT submission point, noting that the requirement to upgrade Great South Road puts too much obligation on the plan change land owners when the upgrade of Great South Road has much wider benefits.
158. The key transport improvements required to service growth in the DOSP are considered to be:
- a) Two new railway stations in Drury Central and Drury West, supported by park and ride facilities. Construction of these is anticipated to start in 2022 and be completed by late 2024 (\$247m, funded by NZUP and ATAP).
 - b) Electrifying the railway track between Papakura to Pukekohe with space for additional lines for future growth, to be constructed by 2024²⁷ (funded by NZUP and ATAP);
 - c) Widening SH1 from Papakura to Drury and building a cycleway alongside it. Construction is expected to start later this year, and completed by 2025²⁸ (\$423m, funded by NZUP and ATAP);

²⁷ p. 38 Assessment of Environmental Effects, Fast-track application <https://www.epa.govt.nz/fast-track-consenting/listed-projects/papakura-to-pukekohe-rail-electrification/application-papakura-to-pukekohe-rail-electrification/>

²⁸ <https://www.nzta.govt.nz/planning-and-investment/nz-upgrade/auckland-package/papakura-to-drury-south/>

- d) Upgrading Mill Road to four lanes and connecting Manukau to Drury. Construction is expected to start in late 2022 and completed by 2027/2028²⁹ (1,354m funded by NZUP and ATAP).
 - e) Upgrade of Great South Road to a FTN standard (unfunded)
 - f) Drury Arterial Network projects, including the Opāheke north-south connection (Project D4), a new arterial road connection from Hunua Road to Waihoehoe Road, and upgrades to Ponga Road and Opāheke Road (Project D5) (unfunded). These are anticipated by SGA to be completed by 2038.
159. As outlined in section 8.2, Flow has reviewed the transport modelling undertaken in the applicant's TA, and considers that the TA has adequately assessed the effects of vehicle trips on the immediate transport network. In particular, Flow advises that the traffic modelling undertaken in the applicant's TA has made appropriate assumptions to reflect the current level of public transport service, and access to walking and cycling networks. However, Flow share's AT's concerns about potential cumulative effects from out of sequence development.
160. Therefore, in my view the key transport considerations for the early staging of PC52 in relation to the FULSS are:
- a) Cumulative effects of urbanisation and integration with the planned transport network
 - b) The reliance on private vehicles arising from the early staging of the site for urban development compared with the FULSS, and the public transport and active mode improvements described above. .
 - c) The overall effect on achieving a quality compact urban form as sought by the AUP(OP) RPS.

Cumulative effects

161. The urbanisation of the PC52 land is considered by the applicant and Flow to have no more than minor effects on the immediate transport network. Larger scale infrastructure identified by SGA will be required to mitigate the cumulative effects of urban expansion on the PC52 site and surrounding area.
162. The ATAP, RLTP and LTP all contain some funding for the Drury projects, in order to coordinate with NZUP funding. Whilst the strategies all note that funding is subject to uncertainties, it is evident that council is prioritising growth in the south Auckland area. However there is still a funding deficit for projects to support growth in Drury that will need to be resolved by commitments from landowners, development and council. This primarily relates to PC48-50. As such, some of this infrastructure may not directly relevant to PC52; however this deficit does not include the upgrade of Great South Road, which is directly relevant to this plan change.
163. The consideration for PC52 is whether it should be delayed until this funding deficit for projects to support cumulative growth is resolved. If approved, urban expansions enabled by PC52 and future plan changes are likely to affect the wider network in the south, and create risks that wider projects across Auckland are not funded or are delayed.

²⁹ As per September 2020 project update by Waka Kotahi NZ Transport Agency <https://nzta.govt.nz/assets/projects/mill-road/mill-road-project-update-newsletter-202009.pdf>

164. It is also possible that if small-scale plan changes to expedite urban expansion in Drury are approved, council will have few options to seek a funding share be collected for larger transport projects. In particular, development contributions can only be collected for projects listed in the LTP³⁰. It is likely that if approved PC52 would not require the developers to contribute towards the cost of projects unfunded by the LTP and notably the future upgrade of Great South Road.
165. In this context, I agree with AT in that funding for these projects should be ideally resolved prior to approving PC52. In my view, given the small scale of the proposal, it would not be appropriate to stage the development or introduce a trigger/threshold to delay the implementation of s224(c) certificates until such infrastructure is place. Therefore, the consideration for council is whether to decline the plan change on the grounds that infrastructure is not in place or fully funded.
166. On balance, I consider that PC52 should not be declined due to a deficit in committed funding for transport projects. The scale of the plan change is such that it would generate only a modest contribution to effects on the wider transport network. The site is serviced by the existing public transport network (discussed below), and planned funded expansions to the network will improve public transport access from 2024 onwards. As outlined in section 4.2.1 of this report, PC52 will expedite housing supply and therefore is likely to have a positive effect on the supply of housing in Auckland.
167. However, I have concerns about the cumulative effects of similar scale urban expansions in the surrounding area. These concerns are to an extent mitigated by the following contextual factors:
- a) The subject land is contiguous to Great South Road, and therefore does not require substantial new infrastructure to establish vehicle access to the site. Within the surrounding Papakura-Drury area there are few FUZ sites with direct vehicle access to Great South Road or other formed roads.
 - b) The site and its immediate surrounds are not constrained by flood plains. The wider Opāheke area east, north and south of the PC52 site are subject to substantial flood plains associated with Otūwairoa / Slippery Creek. The development of these areas will likely require substantial stormwater infrastructure and complex cross-catchment solutions, and as such are likely to be developed as part of wider plan changes.
 - c) Subsequent urban expansion proposals would be required to assess their transport effects and undertake modelling of the existing environment at the time they are proposed. The resultant change in the transport environment due to urban expansions may require future plan changes to be supported by funding commitments towards wider infrastructure projects to mitigate their effects.

Public transport access and climate change effects

168. As outlined earlier in this report, the NPS-UD and AUP(OP) RPS both place a strong emphasis on new growth being supported by public transport³¹. Objective 8 and Policy 1 of the NPS-UD also seeks that urban environments supports reductions in greenhouse gas emissions. Policy 1 outlines that this is a key component of a well-functioning urban environment.

³⁰ Outlined in Schedule 8 to the Development Contributions Policy 2019

³¹ Specifically NPS-UD Objective 3(b), and RPS Policy 2.2.1(1)(1)(d)

169. The PC52 site is currently served by the 376 bus route, operating between Drury and Papakura Interchange, at a peak hour frequency of every 30 minutes (and generally every hour off-peak). The Papakura Interchange enables passengers to connect to the rail network, as well as the local bus network serving Papakura, Pahurehure, Red Hill and Takanini³².
170. In addition, future improvements to the network will enhance public transport access substantially:
- a) Improvements to the frequency of buses from Papakura to Drury station are planned in the Auckland Regional Public Transport Plan 2018-2028 ('RPTP') (refer to **Figure 8** below):
 - i) Increase in frequency of the 376 bus route to
 - By 2021: either every 20 or 30 mins at peak times³³ (depending on patronage expectations) and every 30 minutes at off-peak by 2021
 - By 2028: every 15 minutes at peak times and every 20 minutes at off-peak times.
 - ii) Introduction of a new 374 service from Papakura to Drury via Opāheke, to run every 20 minutes at peak times by 2028.

³² 365, 372, 373, 377, 378

³³ Defined in the RPTP as 'generally between 7am to 9am in the morning and 4pm to 6pm in the evening on weekdays' (p.93)

Figure 8: Excerpt from Auckland Regional Public Transport Plan 2018-2028: Appendix 3³⁴

Bus services					Time (in minutes) between services			
Route Descriptions	Network Status	Patronage expectation	Service Category	Year	Mon-Fri Peak	Mon-Fri Interpeak	Mon-Fri Evening	Weekend Day/Evening
	Non-discretionary (essential for network function)	High	Frequent	2018				
		Medium	Connector	2021				
		Low	Peak	2028				
	Discretionary (not essential)		School					
			Local					
373 - Papakura to Red Hills	Non-discretionary	Low	Local	2018	30	30	60	30 / 60
			Connector	By 2021	20	30	30	30
				By 2028	20	30	30	30
NEW SERVICE 374 - Papakura to Drury via Opaheke with future urbanisation	Non-discretionary	Low	Connector	By 2028	20	20	30	20 / 30
376 - Papakura Station to Drury *Extended to Auranga	Non-discretionary	Low	Local	2018	30	60	60	60
			Connector	By 2021*	30	30	30	30
				By 2028*	15	20	20	20
		Medium	Connector	2018	20	30	30	30 / 60

- b) The Drury Central railway station is anticipated to be completed by 2024, supported by the extension of the electrified network to Pukekohe (also to be completed by 2024). The railway station is expected to be supported by park and ride facilities.

The indicative location of the railway station is some 2km from the PC52 site, and in my view will not be easily accessible by walking or cycling. The proposed station will be beyond a walkable catchment (400m – 800m), and whilst it will be within cycling distance, no cycling facilities exist on Great South Road.

Improvements to the 376 bus route frequency will eventually provide frequent access to the station (by 2028 according to the RLTP). However, in the interim (2024-2028) the primary form of access to the station will likely be by private vehicle.

171. In addition, a baseline level of traffic congestion can be anticipated as the Drury-Opāheke area is urbanised over time. As the local transport network approaches capacity, this will likely see a small modal shift to public transport or active transport as they achieve greater parity in travel times compared with private vehicles. For example, this could result in some future residents in the PC52 area using the train from the Papakura Rail Station and/or the 376 bus rather than use a private vehicle.

172. The quantum of growth sought across the seven Drury plan changes under consideration by council (and in particular PC48-50 in Drury East) and additional growth in the Opāheke area may inform expedited timeframes for investment and delivery of this infrastructure.

³⁴ p.214, Auckland Regional Public Transport Plan, <https://at.govt.nz/media/1979652/rtp-full-doc-final.pdf>

173. Auckland Council's submission to the Climate Change Commission's draft advice to Government (March 2021) is relevant in this respect. The submission advises that: "Unplanned and out of sequence greenfield expansion is more likely to result in higher emissions than intensification in existing urban locations from which there is comparatively better access to a range of employment and other destinations and a range of transport choices".
174. While this is true in a general sense, in my view the greenhouse gas emissions associated with PC52 are likely to be less than other out of sequence expansions³⁵ given:
- a) The site is currently served by public transport, as described above
 - b) The planned public transport improvements in the short and medium term
 - c) The scale of PC52 is small, enabling about 113 dwellings to be developed on the site.

Effects on a quality compact urban form

175. If approved, PC52 and other plan changes may inform expedited funding and delivery of infrastructure to support urban growth ahead of the FULSS sequencing. This would in turn direct more funding from local and central government and the private sector towards greenfield expansion, and away from urban brownfield and infill growth. This may not give effect to the quality compact urban form sought in Chapter B2.2.1(a) of the RPS.
176. However, in my view, these effects can be mitigated because:
- a) As outlined above, there is limited opportunity for similar urban expansions in the immediate area, on site serviced by public transport.
 - b) The plan change is relatively small in scale, and on its own does not require expedited infrastructure funding and delivery compared with existing funding programmes, which are primarily the NZUP, ATAP, LTP and RLTP.

8.3.2 Local improvements and frontage upgrades

177. Submission 13.1 from AT seeks that the plan change incorporate appropriate mechanisms to require the upgrade of Great South Road to an urban standard, and to ensure that development does not adversely affect the ability to undertake the upgrade of Great South Road to an FTN standard in the future. The frontage of the site is currently built, in part, to a rural standard with fragmented footpaths along the site frontage.
178. In submission 13.4, AT outline the mitigation measures they consider necessary to address the potential effects on the transport network. According to AT, these include:
- a) Proposed new intersection with Great South Road to service the enabled redevelopment.
 - b) Provide some widening along the Great South Road frontage to accommodate a painted flush median and right turn pocket (accessing the subject site).
 - c) Upgrading the frontage of Gatland Road and Great South Road to urban standards, including provision of footpath, kerbs and channels, earthworks to integrate with

³⁵ Proposed in PC48-50

development levels, cycle facilities, street lights, berm and street trees as well as a portion of carriageway widening, land vesting and stormwater treatment.

- d) Intersection of Gatland Road and the proposed link road (servicing the subject site) (Road 1 in this report) to provide for a roundabout.
 - e) Provision of crossing facilities along Great South Road given the increase in demand from the enabled development for pedestrians and cyclists to cross Great South Road to access schools and bus stops.
179. Submission 14.3 seeks that the plan change establishes continuous safe pedestrian access to nearby town centres including pedestrian crossings.
180. Further Submission 4 from Wainono Investment Limited opposes the AT submission points, on the basis that no additional provisions/mechanisms to provide certainty around the assessment of the local network improvements are required to mitigate the effects from development, beyond those which already exist in the AUP(OP).
181. Flow supports the mitigations sought by Auckland Transport, with the exception of the roundabout at the Gatland Road / Road 1 intersection. Flow considers the design of this intersection can be determined as part of future resource consent applications. Flow draws particular attention towards the following matters, also raised through the Clause 23 process:
- a) Pedestrian connectivity, including footpaths along the entirety of the site's frontage to Gatland Road and Great South Road, and a pedestrian crossing facility on Great South Road close to the proposed Road 1 intersection;
 - b) Widening of Great South Road to accommodate a right turn bay and sufficient berm space to allow for urbanisation. The resource consent for 520 Great South Road proposes to maintain a 5m buffer zone for future road widening. Flow advises that this would provide a 30m corridor width, which at a high level is sufficient to provide for 4 traffic lanes plus walking and cycling facilities (and is therefore likely to be able to accommodate an FTN in the future).
182. Flow is however concerned that once the site is rezoned, council is faced with a situation where individual consents are sought, each of which are considered a permitted activity, that cumulatively trigger the need for these mitigations measures, but do not reach the trip generation thresholds in Chapter E27 of the AUP(OP)³⁶.
183. I have explored whether bespoke provision/mechanisms are required to ensure that these local network improvements will be delivered through future resource consents. This is outlined in the following paragraphs.

Proposed intersection between Great South Road / Road 1

184. Chapter E27 Transport of the AUP(OP) contains trip generation thresholds, above which resource consent is required as a restricted discretionary activity. The threshold for residential development in the MHUZ is 100 dwellings. In assessing resource consents for activities above this threshold, council must consider the effects on safe and efficient operation of transport network, particularly at peak times, and taking into account the trip characteristics of the proposed activity.

³⁶ E27.6.1 Trip generation

185. As raised by Flow, the main risk of relying on these provisions is that future development will be staged and consents sought cumulatively, therefore avoiding the trip generation thresholds. In my view this risk is low given that the applicant relies on direct access from Great South Road to enable access to 520 Great South Road.

Widening of Great South Road, upgrade of the Great South Road and Gatland Road frontages, pedestrian crossing facilities on Great South Road

186. The live resource consent application for 520 Great South Road proposes to implement these local improvements. Specifically, the resource consent proposes the following:

- a) Urban street frontage including pedestrian footpath, berm and street lighting;
- b) A 5m wide buffer in the form of balance lots, to provide for future road widening;
- c) A pedestrian crossing near to the Road 1 / Great South Road intersection

187. In my view, this resource consent application provides council with a level of confidence that these improvements will be provided to support the development. However, In the event that this resource consent is declined, modified or subject to a section 127 variation to the consent conditions, the AUP(OP) contains the below framework of provisions:

- a) Chapter E27 seeks to achieve an integrated transport network that provides for public transport, walking, cycling, private vehicles and freight³⁷, and that pedestrian safety and amenity along public footpaths is prioritised³⁸. The policies of E27 require subdivision, use and development to manage adverse effects on and integrated with the transport network, such as undertaking improvements to the local transport network³⁹.
- b) The matters of discretion and assessment criteria for trip generating activities (exceeding 100 dwellings) require a consideration of the pedestrian network, including any improvements required to this network. Specifically, activities infringing the trip generation standards in E27.6.1 must be assessed against:
 - i) Effects on the function and the safe and efficient operation of the transport network including pedestrian movement, particularly at peak traffic times⁴⁰.
 - ii) The implementation of mitigation measures proposed to address adverse effects, including contributions to improvements to the local network⁴¹.
- c) Chapter E38 Subdivision – Urban requires sufficient road reserves to be provided to accommodate the needs of different transport modes, stormwater networks, network utilities and other streetscape elements including lighting, street furniture and landscaping. This is outlined in Policy E38.3(17) and referenced through the assessment criteria for all restricted discretionary subdivision activities⁴². However,

³⁷ Objectives E27.2(1) and (2)

³⁸ Objective E27.2(4)

³⁹ Policy E27.3(1)

⁴⁰ E27.8.2(3)(a)

⁴¹ E27.8.2(3)(a)

⁴² E38.3.12.2(g)

this policy is primarily applicable to vacant lot subdivisions, and not to land use led proposals⁴³

188. In my view, the AUP(OP) framework could be relied upon to ensure that transport improvements are implemented to mitigate effects on the adjacent network. However, in my view the AUP(OP) provisions may not be sufficiently robust to require these improvements to be delivered, because:

- a) If the plan change is staged and resource consents are sought progressively such that fewer than 100 dwellings are proposed in any given application, Standard E27.6.1 relating to trip generation will not apply.
- b) Whilst the criteria in E27 (E27.8.2(3)(a)) refer to the safe and efficient operation of the transport network, this implies the current rather than future network. Therefore, clause E27.8.2(3)(a) may be difficult for council to rely on to ensure that future subdivision and development provides a sufficient setback to enable the future widening of Great South Road.

189. Therefore, in my view, precinct provisions should be introduced to provide a framework to provide the improvements described in paragraph 186 above. The proposed precinct provisions on transport improvements are outlined in **Appendix 6** to this report and summarised in **Table 5** below:

Table 5: Summary of proposed precinct provisions on transport matters

Matter	Provisions	Reasons
Setback to provide for future road widening on Great South Road	<ul style="list-style-type: none"> • Objectives and policies seeking integration with the transport network • Matter of discretion and assessment criteria for restricted discretionary subdivision activities 	Chapter E27 does not specifically reference effects on the future transport environment, and therefore is not a robust framework to require a buffer/setback on Great South Road to be achieved.
Upgrade of Great South Road frontage to an urban standard	<ul style="list-style-type: none"> • Objectives and policies seeking integration with the transport network • Matter of discretion and assessment criteria for restricted discretionary subdivision activities 	Whilst Chapter E27 and E38 provide a framework for seeking that an urban frontage and pedestrian connections are provided, this is largely dependent on Standard E27.6.1 Trip Generation. This only applies to the development of 100 or more dwellings, and therefore could be bypassed if future resource consents sought to stage development on 520 Great South Road.
Pedestrian crossing near to the Road 1 / Great South Road intersection	<ul style="list-style-type: none"> • Objectives and policies seeking integration with the transport network • Matter of discretion and assessment criteria for restricted discretionary subdivision activities 	

⁴³ Under E38.4.2(A15) Subdivision in accordance with an approved land use resource consent

190. In my view, the provisions outlined in **Appendix 6** are the most appropriate to achieve the purpose of the plan change and the RPS. This is outlined in section 18 of this report as part of a Section 32AA evaluation of changes to PC52.

191. However, I acknowledge that these mitigations are proposed through the resource consent for 520 Great South Road. As such, if the resource consent is approved, these provisions may not be required to support PC52.

Road 1 / Gatland Road intersection

192. AT have sought that the design of an intersection between Road 1 and Gatland Road be confirmed through PC52, and prefer a roundabout treatment. Flow considers the design of this intersection can be determined as part of future resource consent applications. I agree with Flow and consider that the alignment/design of this intersection does not need to be specified through PC52.

8.4 Internal network and transport connections

193. The plan change does not propose an indicative transport network within the site. The applicant identifies an indicative internal transport network in the masterplanning undertaken in the Urban Design Assessment (shown in **Figure 9** below). This indicative network is similar to what has been proposed for the resource consents currently before council. Whilst these corridor alignments and block structure have not been formalised into the proposed provisions for PC52, they do provide a useful reference for a development scenario for the site.

Figure 9: Indicative masterplan for PC52 site



B&A

Level 4 Old South British Building
3-13 Shortland Street, Auckland
www.barker.co.nz

INDICATIVE MASTERPLAN
520 Great South Road
B&A Ref # 17104

Scale: NTS
Drawn by: CW
Date: 06/06/2019

194. Submission 13.2 from Auckland Transport seeks that the plan change provisions require a link road with separate cycle facilities to be established through the PC52 site.

195. Further Submission 4 from Wainono Investment Limited opposes AT's submission points, and consider that a link road (paper road) already exists between Gatland Road and the balance of the plan change land, and that the road layout for the balance of the site is best left to the subdivision design stage.
196. Flow considers that the AUP(OP) Auckland-wide provisions, as well as AT's standards and guidelines, should 'be able to be relied upon for the delivery of an appropriate transport network' within the PC52 site. Flow therefore consider that Road 1 does not need to be identified through PC52.
197. In addition, Flow does not support provisions requiring a separated cycle facility through the site to be established. Flow advises that the DOSP does not identify any sub-regionally significant cycle links through the site, nor does the applicant's TA. In addition, Flow advises that the design of new streets will be subject to review through future resource consenting processes, and will be subject to Auckland Transport design standards and guidelines which contains metrics to determine the cycling facilities required. Based on the applicant's modelling of a 80vph peak flow on Road 1, Flow advises that if Road 1 is designed for a 30km/h speed environment, a protected cycleway is not required. I agree with Flow and consider that the design and delivery of Road 1, including cycle facilities, can be determined at the resource consent stage.
198. Submission 13.3 from Auckland Transport seeks that a more optimal alignment of the link road (Road 1) is identified and required in the plan change provisions. AT's concern is that the alignment shown in the UDA and resource consents may not be feasible to extend northwards from Gatland Road, and ultimately extend to the future Park Way Road in the north⁴⁴, due it straddling the boundary between two smaller 'substantially developed' properties⁴⁵. AT consider a more appropriate alignment to be the secondary road proposed through the resource consent for 21 Gatland Road. AT also consider that, as proposed, this secondary road could become a rat run for vehicles, should the primary link road extend northwards.
199. Flow supports AT concerns, but queries whether they are relevant to the plan change, given that:
- a) PC52 does not seek to establish the alignment of Road 1, between Great South Road and Gatland Road, nor does the extension of the road northward form part of PC52
 - b) Should a connection be formed between Gatland Road and Park Way Road, this would be considered on its merits when approvals are sought, including any requirements to integrate with side roads, and provide traffic calming to discourage rat-running through the secondary road;
200. In my view, the AUP(OP) provisions can be relied upon to assess the alignment of Road 1 with respect to future connections to the north. In particular, Policy E38.3(10) requires road networks proposed through subdivision to be easy and safe to use for pedestrians and cyclists and connected with a variety of routes within the immediate neighbourhood and between adjacent land areas. The connectivity the transport network on the northern side of Gatland Road can be more appropriately addressed through future plan changes to rezone this land, which will have to consider integration with the Road 1 / Gatland Road intersection once constructed.

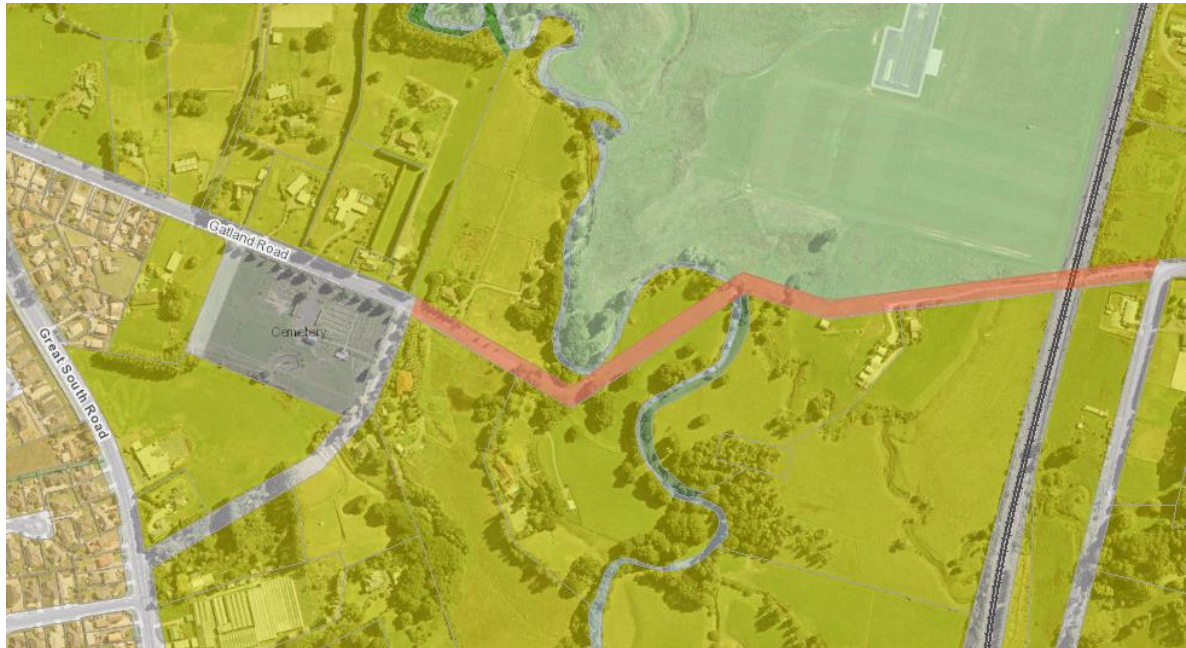
⁴⁴ Within the Ōpāheke 1 Precinct

⁴⁵ 58 and 62 Gatland Road

Formation of Gatland Road

- 201. Some submitters (5.1, 6.1) are concerned about the unformed section of Gatland Road being constructed, noting that there are flooding issues in this area, that a substantial bridge would be required to negotiate the flood plains, and the presence of 400 year old totara trees in this area.
- 202. I understand that the submitters are concerned about the formation of this section of Gatland Road, identified in **Figure 10** below:

Figure 10: Map showing unformed section of Gatland Road in red



- 203. The formation of this section of Gatland Road is not proposed by PC52, nor does the build-out of the plan change rely on forming a connection through this alignment to mitigate its traffic effects. The masterplan prepared through the applicant’s UDA identifies the eastern section of Gatland Road as a Primary Street and Potential Connector Bus Route. This is however an indicative⁴⁶ plan of how the development of PC52 can integrate with its surrounds, rather than a proposed transport network.
- 204. The constraints associated with forming this road alignment, including flooding and trees of heritage or arboricultural value, can be assessed and mitigated through future plan changes to rezone this land.

8.5 Car parking

- 205. Submission 7.1 is concerned with parking available to residents, and seeks to lower the number of dwellings and provide more car parking. The MHUZ requires the following amount of car parking for dwellings:

Studio or one bedroom	No minimum
Two or more bedrooms	1 per dwelling ⁴⁷

⁴⁶ And not identified in the DOSP

⁴⁷ Table E27.6.2.4 Parking rates – area 2

206. Flow considers that the regionwide rules of the AUP(OP) are sufficient to ensure appropriate parking provision. Flow also highlights the NPS-UD direction for car parking minimums to be removed from district plans.
207. I agree with Flow. The AUP(OP) car parking provisions in the MHUZ are similar to those for the Mixed Housing Suburban zone, which predominates the surrounding area. Both zones require one car parking per two or more bedroom dwelling⁴⁸. In my view, the site does not have any particular characteristics that require a higher minimum car parking rate than sites in the surrounding residential area. Therefore I do not support submission 7.1.

8.6 Conclusion

208. I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential transport effects. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA.

9. URBAN DESIGN AND FORM

209. In my view the key urban design considerations for PC52 are:
- a) Do the PC52 provisions align with the direction of the Drury-Opāheke Structure Plan as it applies to land uses, open space and infrastructure?
 - b) Given the advancement of PC52 prior to FULSS sequencing, will sufficient amenities be available to residents once the land is developed in accordance with the MHUZ?
 - c) Does the form of development enabled by PC52 appropriately respond to its surrounding context?

9.1 Alignment with the Drury-Opāheke Structure Plan

210. The applicant's Plan Change Request considers that the proposed rezoning is consistent with the DOSP, as it would enable higher density residential development immediately adjacent to public transport and within easy walking distance of open space and amenities. The request also notes that proximity of the site to Drury and Papakura centres⁴⁹.
211. Ms Mein considers that PC52 is consistent with the direction of the Drury-Opāheke Structure Plan for this location, as the MHUZ allows for higher density residential living. Ms Mein also considers that the applicant's Urban Design Assessment ('UDA') provides a 'thorough analysis of the site, its context, the opportunities and constraints and possible development options and taking all of this into account concludes the proposed MHU is the most appropriate zone for the land.' Ms Mein considers that the UDA "has used a robust urban design methodology to reach a conclusion that is consistent with the intent of the DOSP
212. I agree with Ms Mein's assessment that PC52 is consistent with the DOSP, as it applies to the land use and urban design context. The application of the MHUZ is consistent with the land use map outlined as Figure 1 to the DOSP. The PC52 land is largely located outside of the identified blue-green network applying within and around identified permanent and intermittent streams.

⁴⁸ The difference being that the Mixed Housing Suburban Zone requires 0.5 car parks per dwelling (rounded down to the nearest whole number) for studio or one bedroom dwellings.

⁴⁹ Section 7.3.1, p.17

213. In addition, as discussed in Section 4.6.1 of this report, the early release of the PC52 site for development ahead of the FULSS sequencing will not in my view obstruct the delivery of infrastructure in the indicative alignments identified by the DOSP or the Preferred Network identified by SGA.
214. The DOSP identifies two neighbourhood parks in the vicinity of the PC52 site. In response, the masterplanning undertaken in the applicant's UDA has identified the optimal locations for these parks as being to the north and west of the PC52 land, positioned around flood plains to support stormwater management in addition to passive recreation and leisure uses for residents. This is explored further in section 13 of this report.

9.2 Access to amenities

215. In relation to nearby amenities, the applicant's Plan Change Request reports that:
- a) The plan change land is consistent with the Council's Open Space Provision Policy 2016, as it is served by Opāheke Reserve, a 41 ha suburban park developed with sports fields located 600m from the plan change area, and a neighbourhood park on Drumkeen Place located 100m from the plan change area;
 - b) The plan change area is served by social facilities and amenities in the Drury Centre, 1.5km from the plan change area, and the Papakura Metropolitan Centre, 3km from the plan change area
216. Submitters 5, 6, 7 and 14 raise concerns about the timing of the proposed plan change in relation to social infrastructure for the locality. These include concerns about the extent of open space available, the proximity to services such as eateries, laundromats and groceries.
217. Ms Mein notes that the DOSP identifies the expansion of the Drury town centre to become a large centre to serve the wider area. If this occurs, in Ms Mein's view the plan change area will be in a prime location for access to services and amenities and, in turn, development of the plan change area will support the expansion of the village;
218. Ms Mein also identifies that the plan change land is served by open space, being adjacent to the Papakura South Cemetery which provides a significant area of open space for reflection and passive recreation.
219. I agree with Ms Mein, and consider that sufficient amenities will be available for residents, for the following reasons:
- a) The site is located roughly 3km (as the crow flies) from the Papakura Metropolitan Centre. The Papakura Centre contains a range of commercial amenities, including a supermarket, dairies and fruit & vegetable shops, restaurants and cafes, and healthcare and other services. The Centre is also supported by community facilities, including a library, community centre (Elizabeth Campbell Hall), citizens advice bureau.
 - b) The 376 bus route operates on Great South Road, with both north and southbound stops located within a 5 minute walk of the PC52 land. The 376 bus operates every 30 minutes at peak times, and every hour at off peak times. The Papakura Centre is roughly 5 minutes by car.
 - c) Pedestrian facilities, including a footpath along the entirety of the site's frontage and a pedestrian crossing on Great South Road, can be delivered through the resource consent process, as discussed in section 8.3.2 of this report.

9.3 Response to surrounding context, effects on residential amenity and zoning choice

220. The MHUZ enables a more intensive form of residential development compared with the surrounding Papakura and Rosehill areas. These are established 1-2 storey suburbs and are primarily zoned Mixed Housing Suburban. **Table 4** below summarises the key development standards in the MHUZ and the Mixed Housing Suburban Zone.

221. In relation to bulk and location, the MHUZ sets the following standards:

Table 4: Development standards in the Mixed Housing Urban Zone

Development standard	MHUZ	MHUS
Maximum building height	11m, plus 1m for roof form	8m, plus 1m for roof form
Maximum building coverage	45% of the net site area	40% of the net site area
Maximum impervious area	60% of the site area	
Minimum landscaping	35% of the net site area	40% of the net site area
Building height in relation to boundary	Where adjoining sites zoned MHUZ or Terrace Housing and Apartment Buildings: 45 degree recession plane measured from a point <u>3m</u> above ground level	45 degree recession plane measured from a point 2.5m above ground level
	Where adjoining sites zoned Mixed Housing Suburban Zone or Single House: 45 degree recession plane measured from a point <u>2.5m</u> above ground level	
Front yard	2.5m	3m
Side and rear yard	1m	
Riparian yard	10m from the edge of all other permanent and intermittent streams	

222. In Section 8.2 of the Plan Change Request, the applicant considers that the proposed provisions will mitigate the effects of PC52 on the residential amenity, because:

- a) Applying the MHUZ can respond to the surrounding area, whilst enhancing the visual quality of the existing environment.
- b) The plan change can respond to environmental conditions by retaining the existing stream on site, and transitioning density from existing residential boundaries.
- c) Amenity effects on neighbours can be managed by the MHUZ standards, and particularly the maximum height limit and height in relation to boundaries standards.

223. Submissions 2.1, 3.1, 6.1, 14.1 and 14.2 are from owners and occupiers adjacent or close to the PC52 site. These submitters are concerned about the effects on residential amenity

arising from development of the plan change land. The key issues raised by submitters are:

"It will directly effect [sic] my property outlook, value, sun light, drainage" [2]

"A big factor in us buying our home was the semi rural outlook we have with the views of the Drury Hills, also the amount of the property got and the quietness of no other houses behind us. Prior to buying our home there was no mention of the land behind our home being subdivided and home homes built on it, if we were made aware of this we would not have brought where we did" [3, 6]

The proposed 113 dwellings for the development is far too many for the land size which will mean that the houses will be crammed in, and the houses will be 2-3 story dwellings. Our current views will be completely gone with these houses going in and instead we will be looking at a 2-3 story dwellings that will all look the same and the houses literally crammed in side by side. [3, 6]

We will no longer have any privacy with these houses being up high and looking down on our home and houses being in close proximity to our fence line. We will also lose out on the sun that we get during the morning which will now be blocked out by these houses. [3, 6]

224. These concerns are addressed below in relation to effects at the interface with the plan change site, and loss of outlook/views/

Effects at the interface with PC52

225. Submitters have raised concerns regarding adverse effects on residential amenity arising at the boundary between the PC52 land and adjoining properties. These effects are primarily a loss of privacy, outlook and sunlight as a result of 2-3 storey development occurring within the MHUZ on the PC52 land.
226. Ms Mein considers that the suite of standards contained within the MHUZ should in combination ensure an appropriate transition of development between the PC52 land and existing residential development in this area. Ms Mein references building height (H5.6.4), height in relation to boundary (H5.6.5) and height in relation to boundary adjoining lower intensity zones (H5.6.7) as the key standards that provide for this transition.
227. Relying on Ms Mein, I consider that the proposed provisions can appropriately manage boundary effects of development on lower intensity residential areas. In particular, the MHUZ applies a specific height in relation to boundary standard to ensure that building height and mass is separated from residential sites in lower intensity zones (refer **Table 4**). This control, in conjunction with minimum side and rear yards provide for sunlight to be maintained to adjoining sites and manage potential visual dominance effects of taller (2-3 storey) buildings.
228. In addition, the MHUZ applies a minimum outlook standard for the development of up to three dwellings per site, which is also applicable as assessment provisions for four or more dwellings. This sets an expectation that outlook spaces from windows in principal living areas, principal bedrooms and all other habitable rooms will be separated to a degree from boundaries with neighbouring properties.

Loss of outlook/views

229. Submitters are concerned with the loss of semi-rural views/outlook as a result of urban development on the PC52 land.

230. The urbanisation of the PC52 site has been signalled in policy documents since 2013. The FUZ was identified in the Proposed Auckland Unitary Plan in 2013 and confirmed by council in the AUP(OP) in 2016 following recommendations by the Independent Hearings Panel on the Auckland Unitary Plan. The Drury-Opāheke Structure Plan identified land use zonings for the wider area including the PC52 land. Consultation with landowners and the general public was undertaken on the structure plan between 2017 – 2018 to understand the concerns of stakeholders and incorporate these where appropriate into the DOSP document.
231. As PC52 seeks to urbanise the land prior to the FULSS sequencing, the submitters may have expected that the PC52 site would remain rural until the 2028-2032 period. However, the FULSS is signalled as a non-statutory document to guide development, rather than a means of tying future development to a particular timeframe.
232. Taking into account the planned urban form and character of the local area and wider Drury-Opāheke area has being signalled as early as 2013, I consider that effects on existing rural outlooks will not be meaningfully affected by PC52.
233. The MHUZ enables a more intensive form of development compared with the surrounding residential area, and as such would result in a small change to prevalent amenity values. The applicant considers that this change will enhance the visual quality of the existing environment through new development.⁵⁰ I agree to the extent that townhouse and apartment building development up to three storeys can make a positive contribution to the Great South Road and Gatland Road streetscapes, and that the MHUZ contains provisions to achieve a positive development response to the street frontage.

9.4 Conclusion

234. I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential urban design effects. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA.

10. STORMWATER MANAGEMENT AND FLOODING

235. The applicant's plan change request was supported by a Stormwater Memo prepared by Tonkin and Taylor Ltd. Following a Clause 23 request for information, the applicant supplied council with a Stormwater Management Plan⁵¹ prepared by Tonkin & Taylor. These are contained in **Appendix 1** of this report.
236. Subsequently, discussions between the applicant and council's Healthy Waters department have resulted in a revised SMP being supplied by the applicant on 7 May 2021. The timing and approach for the delivery of this SMP raises two significant concerns. The primary concern is the extremely condensed timeframe for council's Healthy Waters department team to review and respond to this revision, given the need for inputs across the department, and subsequently the timeframe for the reporting planner to reflect on the Healthy Waters assessment.
237. The second concern is whether the process of providing additional material after notification is fair and transparent, and upholds natural justice for any submitters or those

⁵⁰ Section 8.1, Plan Change Request

⁵¹ dated 4 May 2020

who may have submitted on the plan change. This requires consideration of the matters raised by submitters, which are:

- a) The creek separating the area of 470-600 Great South Road from the actual Drury centre and planned train station (6.2)
- b) The need to assess the area east of Great South Road from Coulthard Terrace to the Slippery Creek bridge as a whole, and the need to protect the Slippery Creek ecosystem from the effects of stormwater discharge (5.2)
- c) The difficulty in connecting Gatland Road with Opāheke Road to the east, through the Otūwairoa / Slippery Creek (6.1).
- d) Establishing stormwater connections to 9 and 11 Gatland Road as part of development / resource consenting (9.1)

238. These submissions seek that stormwater effects are mitigated, and raise concerns flood constraints in the wider area, rather than raising an interest in the detailed approach to stormwater put forth by the applicant. Therefore, in my view the provision of new information by the applicant after notification does not raise significant natural justice issues that would require renotification of the revised SMP.

239. The revised SMP proposes the following approach to stormwater and flood mitigation:

- a) Provide a minimum of Stormwater Management Area – Flow (SMAF) 1 hydrological mitigation for all impervious surfaces on the plan change site, in accordance with the requirements of council’s Network Discharge Consent.
- b) Limit the generation of contaminants through selection of green building materials and providing green infrastructure to treat runoff at-source or as close to the source as practicable
- c) Protect, restore and enhance the on-site intermittent stream (Watercourse A). Daylight the downstream piped section, restoring stream ecological values and function.
- d) Pass forward flows without on-site flood attenuation so that runoff flows into the Slippery Creek watercourse downstream before peak flooding from the upper reaches of the catchment

240. The majority of flows are proposed to be conveyed from the PC52 site to ‘Watercourse A’ which drains to Slippery Creek (see **Figure 11** below).

Figure 11: Alignment of Watercourse A and piped infrastructure on 520 Great South Road (Figure 2-8, SMP)



241. The SMP proposes a toolbox of BPO for stormwater management devices to achieve these aims, summarised on pages 8-11 of the SMP.
242. An Engineering and Infrastructure Report ('EIR') prepared by Blue Barn dated 27 June 2019 was submitted with the plan change request. This report applies to 520 Great South Road only. The EIR proposes to realign the open channel along the north east boundary of the site to convey stormwater, and treat water through on-site mitigation on the proposed residential lots, and vegetated bioretention devices for the public road network.
243. Ms Trenouth has assessed the SMP and EIR along with submissions for council, with inputs from the catchment manager and senior specialist in council's Healthy Waters department.
244. Ms Trenouth advises that Healthy Waters supports the SMP approach for the following reasons:
 - a) Peak flows from the plan change site can be passed forward without detention before peak flows from the greater catchment arrive. This approach is consistent with the DOSP.
 - b) A toolbox approach to managing water quantity (including infiltration, bio-retention and rainwater tanks) is appropriate.
 - c) The approach to water quality is to treat all contaminant generating impervious areas at or near source to target sediments, metals and gross pollutants. This includes the use of inert building materials for roofs, which Healthy Waters support. The approach to treating stormwater from roads with devices including swales, raingardens and tree pits is acceptable.

245. However, Ms Trenouth is concerned that the proposed provisions cannot be relied upon to implement the recommendations of the SMP at the time of resource consent. Ms Trenouth notes that:

- a) The Stormwater Management Area – Flow 1 ('**SMAF 1**') overlay should be applied to the plan change, as recommended by the SMP, to ensure that relevant detention and retention controls are identified and imposed at the time of consent. Without the SMAF 1 control identified on the planning maps, there is no ability for council to require hydrology mitigation at the time of development, including the imposition of relevant conditions.
- b) In respect of water quality, the AUP(OP) manages treatment only from high generating roads (E9) and through vacant lot subdivisions, which through Policy E38.3(22) requires an integrated stormwater approach in accordance with an approved NDC. This policy however does not apply to subdivision in accordance with an approved land use consent⁵², which is only required to consider 'the effect of the design and layout of the proposed sites created'⁵³.
- c) The AUP(OP) framework therefore contains no provisions to implement the recommendations of the SMP on water quality. There is no requirement for inert buildings materials to be used for roofs of residential dwellings, nor is there a process for assessing other treatment options where inert materials are not used. In addition, the AUP(OP) does not require treatment of stormwater from local roads or jointly owned access lots.

246. Therefore, Ms Trenouth supports the following modifications to PC52:

- a) Application of the SMAF 1 control to provide for stormwater detention and retention.
- b) Introduction of precinct provisions requiring:
 - i) Quality treatment mitigations outlined in the SMP, including the use of inert building materials (cladding, roofing and spouting) and treatment of stormwater from all other impervious areas in accordance with GD01.
 - ii) Water quantity mitigations to outline how retention and detention required under the SMAF 1 control should be implemented.

247. Ms Trenouth considers that the application of the SMAF 1 controls and precinct provisions are more appropriate than relying on the AUP(OP) provisions because they will:

- a) Better give effect to the NPSFM, including Policy 3 (integrated management of freshwater), Policy 8 (protection of significant values of outstanding water bodies), Policy 9 (protection of habitats of indigenous freshwater species).
- b) Better give effect to the AUP(OP) RPS provisions for stormwater in Chapter B7.3 Freshwater systems
- c) Achieve greater consistency with the stormwater management policies contained in Chapter E1.

⁵² Rule E38.4.2(A14)

⁵³ Matter of discretion E38.12.1(6)

248. In relation to water quantity, I support the application of the SMAF 1 overlay to the site through PC52. This is primarily because the stormwater approach for the plan change has identified the need to adopt, at a minimum, SMAF 1 levels of hydrological mitigation. The proposed provisions should therefore require these outcomes to be achieved on the site, and if not, provide mechanisms for council to assess the effects on the receiving environment at the resource consent stage.
249. In relation to water quality, I agree with Ms Trenouth in that the Auckland-wide AUP(OP) provisions only require quality treatment from high contaminant generating roads and car parks, and through vacant lot subdivisions (and not land-use led resource consent applications). Therefore, relying on the AUP(OP) provisions as proposed through the plan change request presents a risk that future subdivision and development on the PC52 site does not implement the SMP mitigations. Therefore, in my view, precinct provisions should be applied to the PC52 site to require the SMP recommendations on quality to be implemented.
250. The proposed SMAF 1 and precinct provisions on stormwater management are outlined in **Appendix 6** to this report and summarised in **Table 7** below:

Table 7: Summary of SMAF 1 and precinct provisions proposed to apply to PC52

Matter	Provisions	Reasons
Water quantity treatment	<p>SMAF 1 control requiring retention/detention for stormwater from impervious areas greater than 50m²</p> <p>Precinct provisions to complement SMAF 1 and reflect SMP approach:</p> <ul style="list-style-type: none"> • Policy Ixx.3(2) requiring hydrological mitigation with a hierarchy of treatment options • Assessment provisions for subdivision requiring consideration against the relevant AUP(OP) E1 policies and the SMP 	<p>The AUP(OP) provisions in Chapters E1, E8 and E9 do not specifically require stormwater retention or detention (other than in limited circumstances) and therefore cannot be relied upon to implement the SMP recommendations.</p> <p>Precinct provisions on water quantity are supported to clarify how the retention and detention requirements of SMAF 1 should be achieved.</p>
Water quality treatment from buildings	<p>Precinct provisions:</p> <ul style="list-style-type: none"> • Policy Ixx.3(1) requiring quality treatment by using inert building materials. • Standard Ixx.5.1 requiring new building to use inert cladding, roofing and spouting materials that do not have an exposed surface made from zinc, copper or lead. • Assessment provisions for subdivision requiring consideration against the relevant AUP(OP) E1 policies and the SMP. • Assessment provisions for infringements to standard Ixx.5.1 	<p>The AUP(OP) provisions do not specifically address quality treatment from residential buildings and therefore cannot be relied upon to implement the SMP recommendations.</p>

<p>Water quality treatment from other impervious surfaces</p>	<p>Precinct provisions:</p> <ul style="list-style-type: none"> • Policy Ixx.3(1) requiring quality treatment through stormwater devices designed in accordance with GD01 • Policy Ixx.3(3) requiring communal stormwater devices to be located, designed and constructed to minimise the number of devices in the road, contribute to a quality built environment. • Assessment provisions for subdivision requiring consideration of Chapter E1 policies and the SMP, implementing a treatment train approach for all impervious surfaces, and the design and efficacy of proposed stormwater infrastructure and devices. 	<p>Chapter E9 controls stormwater quality from high-use roads (more than 5000 vehicles per day) and contaminant generating car parks.</p> <p>The SMP recommends at-source and communal devices to minimise the generation of contaminants from roads, car parking and high contaminant generating areas. The roads, JOALs and car parking likely to be developed on the PC52 do not require resource consent under Chapter E9.</p> <p>Therefore, precinct provisions are required to provide certainty that the SMP recommendations will be implemented.</p> <p>Precinct provisions are also proposed to minimise the number of stormwater devices in the road reserve. Healthy Waters are particularly concerned with the extent of raingardens proposed through the 520 Great South Road resource consent.</p>
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251. These provisions have been informed by matters raised by Ms Trenouth in Appendix 2 to her review, and address similar matters to those proposed in Plan Change 58 to the AUP(OP) as notified, which is located within the same catchment as PC52.

252. In my view, the application of the SMAF 1 control and precinct provisions provides greater certainty for council that PC52 would mitigate stormwater effects on freshwater, and therefore give effect to Chapter E1 of the AUP(OP), Chapter B7.3 of the RPS and the relevant policies of the NPSFM. This is discussed further in section 18 of this report in relation to a Section 32AA evaluation.

10.1 Conclusion

253. I consider that the PC52 provisions, as proposed to be modified by **Appendix 6** to this report, will be sufficient to avoid, remedy or mitigate potential effects related to stormwater discharge and diversion associated with the Plan Change. Subject to these modifications, I am satisfied that the provision of the AUP(OP), as proposed to be amended by PC52, are the most appropriate way of achieving the objectives of the AUP(OP) and RMA.

11. WATER SUPPLY AND WASTEWATER EFFECTS

11.1 Water supply

254. The applicant's Engineering Infrastructure Report assesses water supply. This report finds that the existing reticulated network is available from Great South Road, including 150mm diameter watermains on each side of the road. Blue Barn report that Veolia Water have previously advised that there are no restrictions or limitations with the existing water supply network to supply water to the development.

255. Submission 10.2 from Veolia Water Services raises concerns that the capacity of the water supply network has not been demonstrated, and should be modelled by the applicant. The following information in particular is sought by Veolia:

- a) network modelling of the existing network with the additional demand proposed

- b) an assessment of the water infrastructure upgrades that might be required to service the development
256. Further submission 4 from Wainono Investment Limited opposes the Veolia submission, on the basis that the matters raised in the submission do not require the addition of any new rules or provisions, as these matters can be considered at the subdivision consent stage. The further submitter notes that there are no fundamental water/wastewater supply issues that would preclude zoning of the land as sought.
257. Mr Niravath has reviewed the Engineering Infrastructure Report and Veolia submission, and considers that this information is necessary to determine whether the development can be serviced by water infrastructure.
258. Mr Niravath notes that Veolia Water has requested further modelling analysis to determine whether the existing reticulated network has sufficient capacity to service development of the PC52 land, or whether upgrades are required. This was signalled by Veolia Ltd in their technical advice to Mr Niravath in informing the Clause 23 request for information, and was presented as an advice note in the Clause 23 Request.
259. Mr Niravath notes this can be demonstrated at subsequent subdivision consent stage. However, in my view, this would be best provided in support of the plan change to demonstrate that, at a high level, the effects of the plan change on the reticulated water network can be avoided, remedied or mitigated. In my view confirmation of the water supply capacity to service the site this should be provided through evidence by the plan change applicant.

11.2 Wastewater

260. The applicant's Engineering Infrastructure Report identifies that the public reticulation (150mm wastewater line) crosses the subject site, and discharges to a pump station on the southern side of Slippery Creek bridge adjacent to 135 Great South Road. Most of the site can be serviced by a gravity connection to the existing network, however given the elevation of the site, a pump station would be required to convey wastewater from some future lots to this network.
261. Submission 10.3 from Veolia seeks that wastewater disposal from the plan change area be required to connect to the public wastewater network, and discharge to the Slippery Creek Wastewater Pump Station, Motorway Wastewater Pump Station and across State Highway 1 to the Hingaia Wastewater Pump Station. Submission 10.4 from Veolia seeks that such infrastructure is funded, designed and constructed by the applicant. Submission 10.5 seeks that the applicant obtain approval from Veolia for connection points to the local network.
262. As outlined above, further submitter 4 Wainono Investment Limited opposes the Veolia submission, and considers that the matters raised by Veolia can be resolved at the subdivision consent stage.
263. Mr Niravath has reviewed the Engineering Infrastructure Report and Veolia submission. Mr Niravath notes that the applicant's current proposal represents a high-level assessment, which requires further refinement to determine the required infrastructure work. However, Mr Niravath is satisfied that a suitable design can be reached at the detailed design stage.
264. Relying on the advice of Mr Niravath, I consider that a wastewater solution is available for the site and that the design of the wastewater network and connections to the existing public network can be determined through future resource consenting and engineering plan approval processes. In the AUP(OP), Chapter E38 enables council to assess whether

appropriate provision is made for infrastructure⁵⁴. The EPA process requires as-built plans to demonstrate that infrastructure is designed and constructed to council's standards. Any new works required within the Papakura area require Veolia's formal approval, and must be consistent with Watercare Services Limited's engineering standards framework.

11.3 Conclusion

265. I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential effects related to water supply or wastewater servicing. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA.

12. GEOTECHNICAL

266. The applicant has supplied geotechnical reports for both 520 Great South Road and 21 Gatland Road.

267. The Geotechnical Investigation for 520 Great South Road finds that the site is not subject to erosion, significant subsidence (including liquefaction), falling debris, slippage or inundation by soil or rock.

268. The Geotechnical Investigation for 21 Gatland Road was supplied to council in response to the Clause 23 request. It finds that the risk of slope instability is considered low considering the relatively high strength soils, and the gentle land gradients of the subject site and surrounds. In addition, it makes a number of recommendations for earthworks, foundations and stormwater runoff.

269. There are no submissions relating to geotechnical effects.

270. Mr Lander has reviewed the application, and makes the following observations:

- a) The applicant has undertaken sufficient preliminary ground proving investigations and adequately assessed the private plan change effects on the environment related to geotech effects
- b) The key geotechnical issues relate to the existing fills and land modifications in the eastern corner of the site (at 520 Great South Road), and the filling in low lying portions which have not yet been assessed in detail.
- c) Further geotechnical assessment should be undertaken as part of the resource consent process once the nature of earthworks is known. This would need to consider the following:

“development within, or in close proximity to, the eastern corner of the site and/ or low lying portions of the site which have not been investigated or assessed as part of the Private Plan Change study. Further investigations would probably be warranted to prove ground conditions in these areas, should development plan to extent into such areas.”

271. Based on Mr Lander's peer review of the application, I understand that the sites at 520 Great South Road and 21 Gatland Road are generally suitable for residential development, but that further assessment is required once the extent of earthworks are known. In

⁵⁴ E38.8.12.2(6)(a)(i), applicable to subdivision in accordance with an approved land use resource consent

particular, the fill and land modifications undertaken in eastern corner of 520 Great South Road, around the existing watercourse have not yet been assessed.

272. The AUP(OP) contains a framework in Chapters E11 and E12 requiring a consideration of effects of land disturbance on the stability of a site's surrounds. This includes policies requiring earthworks to be designed and undertaken "in a manner that ensures the stability of surrounding land, buildings and structures"⁵⁵, and a standard requiring that land disturbance must not result in instability of land or structures beyond the boundary of the development site⁵⁶. These are supported by assessment provisions enabling Council to assess potential instability effects on surrounding land and buildings⁵⁷.
273. In addition, Section 106 of the RMA enables a consent authority to refuse to grant a subdivision consent, if it considers that there is a significant risk from natural hazards.
274. In my view, the AUP(OP) contains a sound framework to enable an assessment of land stability through resource consent applications, both in terms of the subject site and surrounding land. This will enable council to assess stability effects not explored in detail through this plan change request, particularly the stability of the land by the existing watercourse at 520 Great South Road.
275. Therefore, I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential geotechnical effects. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA.

13. PARKS AND OPEN SPACE

276. The applicant's Plan Change Request assesses whether PC52 has sufficient access to parks and open spaces. The applicant finds that the proposal is consistent with Auckland Council's Open Space Provision Policy 2016, which in relation to the MHUZ requires:

Neighbourhood Parks should be within a 400m walk in high and medium density residential areas, are typically between 0.3 to 0.5 ha and typically include play space and flat 'kick a ball' space.

Suburb parks should be within a 1km walk of high and medium density residential areas, are typically between 3 – 5 ha and typically include provision for organised sport and recreation.

277. The applicant notes that the PC52 land is located within 600m of Opāheke Reserve, a 41ha suburban park recently developed with sports fields that meets the criteria outlined in Council's policy. In addition, a 4,000m² neighbourhood park exists on Drumkeen Place / Parkhaven Drive located within 100m of the PC52 land that has play facilities and green space.
278. In addition, the applicant's UDA identifies the need for a new Neighbourhood Park within the wider neighbourhood. The Plan Change Request considers this to be contextual information rather, rather than considering the new park to be necessary to support the proposed rezoning.

⁵⁵ Policies E11.3(6) and E12.3(6)

⁵⁶ Standard E12.6.2(2)

⁵⁷ Clause E12.8.1(1)(c) and E12.8.2(1)(c)

279. Submission 7 raises concerns on the extent of open space/parks available to future residents, and effects. The submission notes that Opāheke Reserve is currently a 41 minute walk from the subject site, and that the neighbourhood park at Parkhaven Drive/Drumkeen Place is difficult to access given that it requires crossing Great South Road, which at times is a very busy road.
280. Submission 5.2 is concerned with effects on the Papakura South Cemetery. The submitter states that the cemetery is a private sensitive area, and should not have homes overlooking this space.
281. Ms Richards has assessed the application and submissions for council, and in particular has reviewed the following matters, discussed in the below sections:
- a) Whether the open space demand associated with PC52 is in accordance with Auckland Council's Open Space Provision Policy 2016
 - b) The appropriateness of the stormwater treatment/esplanade reserve indicated on the masterplan in the applicant's UDA.
 - c) The interface with the Papakura South Cemetery

13.1 Open space demand

282. In respect of open space demand generated by PC52, Ms Richards agrees with the applicant in that PC52 is in accordance with Auckland Council's Open Space Provision Policy 2016. Ms Richards confirms that under the policy, PC52 "requires no additional open space to support the proposed rezoning of the Plan Change Area to a medium density residential area, as Opaheke Sports Park and Parkhaven Reserve provide both a neighbourhood park within 400m walk and a suburb park within 1000m walk". Ms Richards advises that this has been confirmed with Mr Ezra Barwell, Senior Policy Advisor, Community Investment within Auckland Council.
283. In regard to the Opāheke Reserve, Ms Richards acknowledges that there is currently no direct access through the site to the suburb park given that the eastern section of Gatland Road is unformed. However, Ms Richards is satisfied that connections to this open space will be achieved in the future accordance with the DOSP.
284. Relying on Ms Richards assessment, I consider that no open space is required within the plan change area under the council's Open Space Provision Policy 2016. In respect of access to the Parkhaven Drive/Drumkeen Place reserve, I note that a pedestrian crossing is proposed through the 520 Great South Road resource consent application, and as discussed in section 8.3.2 of this report, such a facility can be required through the PC52 provisions.

13.2 Stormwater treatment / esplanade reserve

285. Ms Richards supports the stormwater treatment/esplanade reserve shown on the indicative masterplan, as a greenways link from the site to the future esplanade network that will eventually connect to the Slippery Creek Esplanade Reserve. Ms Richards notes that this will "provide a buffer between the subject site and the Papakura South Cemetery, reducing reverse sensitivity effects".
286. Ms Richards also comments on the Papakura Greenways Plan Sept 2017 and the blue-green network outlined in the DOSP. Ms Richards confirms that neither plan identifies a greenways connection through the PC52 site. Instead, both identify Gatland Road as a future greenway route connecting to a Slippery Creek esplanade reserve network.

287. In my view, this open space can be delivered through the mechanisms of Chapter E38–Urban of the AUP(OP)⁵⁸, rather than being zoned as Open Space in PC52. Once vested in council, this area can eventually be rezoned through council-led plan changes to rezone vested open spaces.

13.3 Interface with Papakura Cemetery

288. Ms Richards has received advice from Ms Rosie Stoney, Senior Service Development Specialist for Cemetery Services, Auckland Council. Ms Stoney seeks that suitable landscaped buffers are provided at the boundaries with the cemetery, particularly the eastern boundary of 21 Gatland Road. Ms Stoney also advises that plant selection needs to be selected mindfully as big trees with expansive root systems can over time encroach on graves, damage concrete burial beams, and damage headstones. I understand that the primary concern is the east/west interface between 21 Gatland Road and the cemetery.

289. The indicative masterplan in the UDA shows the north-south paper road being formed as the primary connection through the site, with the option to extend northwards to eventually connect with Bellfield Estate. This design is included in the lodged resource consents lodged, notably the subdivision consent for 21 Gatland Road which proposes to use this road for access. However the plan change does not require or compel this outcome.

290. In my view there is sufficient corridor width within the paper road to establish a local road including carriageway and kerb in accordance with the TDM whilst providing landscaping along the boundary with the cemetery site. The paper road is 20m wide, whereas a typical local road, including two lane carriageway and road reserve (including footpaths, berms, street lighting and car parking bays) might measure roughly 16m.

291. There are no specific AUP(OP) zoning or subdivision provisions that address the visual quality of interfaces with the Special Purpose – Cemetery Zone. However, such effects can be considered under a discretionary or non-complying activity, which allows for unfettered consideration of the RPS provisions, notably Policy B2.7.2(7) which seeks to “avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities. Policy B2.3.2(1)(a) seeks that subdivision use and development supports the planned future environment, including its relation to its surroundings, including landscape and heritage.

292. Regardless of whether landscaping is provided at this interface, the likely development of the paper road to service the development will provide separation between the cemetery and dwellings within PC52. In addition, the gravestones are currently focussed towards the north/northeast extent of the PC52 towards the Gatland Road boundary (the closest gravestones being some 60m from the boundary with 21 Gatland Road).

293. Additionally, landscaping could be accommodated within the perimeter of the PC52 should Cemetery Services seek greater certainty that a visual buffer is provided.

294. In respect of the southern boundary of the cemetery adjoining the stream, the UDA identifies residential outlook over the stream and potentially the cemetery. However, this is not an outcome sought by the plan change, and the presence of the stream provides for a physical separation between residential development and the cemetery.

13.4 Conclusion

⁵⁸ Chapter E38 requires the vesting of esplanade reserves adjacent to rivers or streams 3m or more in width, on sites less than 4ha.

295. I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential effects parks and open spaces. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA.

14. MANA WHENUA

296. Submission 8.1 from Ngati Te Ata Waiohuria seeks to reject the application on the basis that there has been a lack of iwi consultation, engagement and consideration of the Submitter's cultural preferences resulting in a failure to give effect to sections 6(e), 6(f), 7(a) and 8 of the RMA.

297. Ngāti Te Ata Waiohuria are particularly concerned with the lack of any '*real iwi consultation engagement, or consideration of the Submitter's cultural preferences when developing the plan change*'. They note that:

- Established Treaty principles emphasise tribal rangatiratanga, the active protection of Maori people in the use of their lands, waters and other taonga, and the duty to consult with Maori.
- Partnership requires a duty to interact in good faith and in the nature of a partnership
- Redress is the obligation to remedy past breaches of the Treaty. While the obligation of redress sits with the Crown and Auckland Council, the applicant has a role in a more collaborative approach with iwi.

298. Ngāti Te Ata Waiohuria identify examples of more successful consultation, including engaging the submitter more comprehensively in the plan change process, including undertaking a cultural values-impact assessment report; incorporating Te Aranga Design Principles and other key design themes and principles into the plan change; and incorporating Mana Whenua principles into freshwater solutions on the site.

299. Ngāti Te Ata Waiohuria do not however specify what matters or aspects of this plan change they have a particular interest in.

300. Ngāti Te Ata Waiohuria's submission is supported by Further Submission 3 from Ngāti Tamaoho Trust, which is concerned with the lack of opportunity for meaningful engagement and input into design that represents the values of Mana Whenua.

301. As outlined in Section 9.1 of this report, the applicant's Plan Change Request advises that a hui was held on-site with Ngāti Te Ata Waiohuria, Ngai Tai Ki Tamaki and Ngati Tamaoho. According to the Plan Change Request, the iwi groups had no issue with the rezoning proposal, but sought to be involved in the resource consents for development of the site.

302. In this regard, the applicant has fulfilled the requirements of Clause 4A to the First Schedule RMA, which requires local authorities, before notifying a proposed policy statement or plan, to provide a copy of the draft to iwi authorities, and have particular regard to any advice received from those iwi authorities. Therefore, in my view the plan change should not be declined due to insufficient consultation.

303. With respect to cultural preferences, the RMA framework requires decision makers to recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga is recognised and provided for (s 6(e) RMA), and the protection of historic heritage (s 6(f) RMA). The RPS section of the AUP(OP) seeks to recognise Mana Whenua values, mātauranga and tikanga, the

relationship of Mana Whenua with natural and physical resources, and protect Maori cultural heritage (B6.5).

304. Whilst the RMA decision-making framework requires consideration of the submitter's cultural preferences, such preferences (or values) need to be determined by Ngāti Te Ata Waiohua. However, to assist the decision-makers, the key preferences/values that Ngāti Te Ata Waiohua may have an interest in are assessed below (in cross-reference to elsewhere in this report):

- a) The quality and quantity of stormwater discharge from the site is likely to be of interest, given the sensitivity of the receiving Otūwairoa / Slippery Creek environment. These effects are addressed in section 10 of this report. Healthy Waters are supportive of the stormwater quality and quantity management approach in the applicant's SMP, and that these respond to the issues raised by Ngāti Te Ata.

However, Healthy Waters agree with the submitter that there are further opportunities for incorporating Mana Whenua principles into freshwater solutions including stormwater management. To this effect, Ms Trenouth has recommended precinct provisions to require consideration of Mana Whenua values. In my view, these values should be clearly communicated by Ngāti Te Ata Waiohua and Ngāti Tamaoho Trust through evidence on PC52, before determining whether additional provisions are necessary to address them.

- b) There are no identified historic heritage or cultural heritage items within the PC52 site. In relation to HNZPT's submission (refer to section 15 of this report), Mr Brassey from the council's heritage unit considers that the potential unearthing of archaeological evidence on the site during earthworks can be managed under the AUP(OP)'s accidental discovery protocol and the Heritage New Zealand Pouhere Taonga Act 2014.

305. I recommend that a decision on PC52 takes into account the cultural preferences of Ngāti Te Ata Waiohua and Ngāti Tamaoho Trust as expressed through evidence, if such evidence is prepared by the submitters.

306. Subject to the matters raised in any further evidence lodged by the submitters being provided, I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential effects on Mana Whenua. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA

15. HISTORIC HERITAGE

307. The applicant has not assessed historic heritage or archaeological effects in the plan change request. No Cultural Heritage Inventory sites are identified on the PC52 site. In the AUP(OP), no historic heritage places or extents of places, or sites of significance to Mana Whenua, are identified on the site.

308. Submission 12 from Heritage New Zealand Pouhere Taonga ('HNPT') seeks that prior to approval of the plan change, an archaeological assessment of the site is undertaken, or that the plan change is amended to require this assessment to be completed prior to development. HNPT consider there is potential for archaeological material to be present on the site or downstream within Otūwairoa / Slippery Creek, given that:

- a) The original historic alignment of Great South Road crosses the subject property. This road follows a series of overland tracks or 'ara' which functioned as an economic supply line and as 'ara wairua' or spiritual pathways.

- b) The land has been used for farming and a structure is visible on the 1942 aerial which may predate 1900.
- c) The land is only 400m from Slippery Creek.
309. I have sought advice from Robert Brassey, Principal Specialist Cultural Heritage, on whether an archaeological assessment is required in order to recommend approving PC52. Mr Brassey advises that:
- a) The Great South Road alignment was upgraded in the 1860's and used as a military road during the New Zealand Wars, but was not the main supply line during these wars. A corner of the Great South Road on the west side of the plan change area was rerouted after 1933 (see S027429) to its present alignment. Only a small section of the original alignment lies within the plan change area, and most of that route is under buildings, driveways or sealed parking areas. There is some potential for finding evidence (such as a metalled surface) of the original road or more recent development or farming activity.
- b) The house shown on the 1942 aerial is not present on the 1910 aerial (DP 6762), which does show a building on an adjacent property beyond the plan change area. Therefore it is unlikely to be pre-1900.
- c) It is unlikely that here will be subsurface evidence of Maori settlement/activity within the plan change area due to the topography and soil type in this area (the latter was unsuitable for pre-European Maori cultivation), and the distance from the Slippery Creek stream corridor and from the coast.
- d) The possibility of archaeological evidence being present in the plan change area cannot be entirely excluded. Despite this, it is appropriate to rely on the accidental discovery provisions in the AUP, and the Heritage New Zealand Pouhere Taonga Act 2014 legislation, rather than requiring the applicant to amend the plan change or for Auckland Council to support a decision requiring an archaeological assessment as part of the plan change.
310. Based on Mr Brassey's opinion, I am satisfied that an archaeological assessment is not required prior to the plan change being approved. I agree with Mr Brassey's view that the accidental discovery protocols outlined in Chapters E11 and E12 of the AUP(OP), in conjunction with Heritage New Zealand Pouhere Taonga Act 2014 can be relied upon should subsurface evidence be discovered during development of the site.
311. I am satisfied that the AUP(OP) provisions, as proposed to be amended by PC52, will adequately address potential effects on heritage and archaeological values. Therefore, I consider that they are the most appropriate way to achieve the objectives of the AUP(OP) and purpose of the RMA.

16. RECOMMENDATIONS ON SUBMISSIONS

16.1 Transport matters

Sub. No	Submitter Name	Summary	Further subs
2.1	Casey Norris	Decline the plan change as it will directly affect the submitters property outlook, value, sun light, drainage and traffic management.	FS02 - Support

3.1	Jamie Barry Mackenzie	Decline the plan change. (<i>Submitter raises concerns regarding traffic congestion and noise as a result of additional traffic on Great South Road</i>)	FS02 - Support
4.1	Chris Caldwell	Approve the plan change with the amendments requested by the submitter.	-
4.2	Chris Caldwell	Upgrade the safety provisions for the proposed intersection.	-
5.2	Judy and Peter Coleman M & J Coleman	Oppose the parcel of land being rezoned Mixed Housing Urban. (<i>Submitter raises concerns on the difficulty of negotiating traffic on Great South Road</i>)	FS02 - Support
6.1	Priyanka Hulikoppe	Decline the plan change. (<i>Submitter raises concerns regarding traffic congestion and noise as a result of additional traffic on Great South Road</i>)	FS02 - Support
11.1	Srini Reddy	Objects to PC 52 as this development will affect the submitter's newly proposed drive way and the median strip which was approved by the Auckland Transport for 541 Great South Road, which is opposite to 520 Great South Road.	FS01 – Auckland Transport (Support in part)
13 ⁵⁹	Auckland Transport	Auckland Transport opposes the Proposed Private Plan Change for the reasons outlined in Attachment 1, as it does not consider that it contains sufficient provisions or mechanisms to enable the adverse effects arising from the resultant development and subdivision to be appropriately mitigated.	N/A
13.1	Auckland Transport	That the Proposed Private Plan Change incorporate provisions and / or identifies appropriate mechanisms to provide for the upgrade of Great South Road to urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable a future Frequent Transport Network. These provisions and / or mechanisms should include requirements addressing the following in relation to the upgrade of Great South Road: - Vesting and formation of frontage upgrades - Timing of upgrade requirements - Funding and delivery of the above work	FS04 – Oppose (Wainono)

⁵⁹ Note: decision sought by Auckland Transport not recorded in the summary of submissions in error.

13.2	Auckland Transport	Inclusion within the plan change of a requirement to form a link road with separate cycle facility between Great South Road and Gatland Road which should be readily capable of being extended northward. This should also indicate the alignment of the road.	FS04 – Oppose (Wainono)
13.3	Auckland Transport	That a more optimal alignment for the Great South Road to Gatland Road link is included as part of the plan change. In the event that the alignment is not changed, Auckland Transport seeks provisions to ensure the roads and intersections are designed so as not to preclude future access to the north and to avoid any adverse effects from through traffic.	FS04 – Oppose (Wainono)
13.4	Auckland Transport	That the Proposed Private Plan Change incorporate provisions and mechanisms to provide certainty around the assessment of the local network improvements required to mitigate the effects from development enabled under the plan change. That the Proposed Private Plan Change incorporate provisions allowing the staging of subdivision and associated mitigation related works to be a matter for discretion.	FS04 – Oppose (Wainono)
13.5	Auckland Transport	That the Proposed Private Plan Change incorporate appropriate provisions / rules to address the matters raised within this submission. These provisions could potentially be addressed by inclusion within the Auckland Unitary Plan of a precinct plan and associated provisions and or alternative mechanisms.	FS04 – Oppose (Wainono)
14.3	David and Sarah Bryant	Establish continuous safe pedestrian access to nearby Town Centre's including pedestrian crossings.	-
15.1	Wainono Investments Ltd	Seeks to accept the Plan Change, including its extent to include 21 Gatland Road. This is subject to the Residential – Mixed Housing Urban being applied and that no further rules or provisions are imposed on 21 Gatland Road or the plan change area more generally, beyond those of the Residential – Mixed Housing Urban and as otherwise currently apply in the Unitary Plan.	-

Discussion

312. Submissions 4.1, 4.2 and 11.1 relate to the design and alignment of the indicative Great South Road / Road 1 intersection. These are addressed in section 8.1 of this report, which finds that the exact design and location of this intersection is not proposed through this plan change, and can be explored through the resource consent process.
313. Submissions 2.1, 3.1, 5.2 and 6.1 relate to the effects of increased traffic and road noise on Great South Road. These are discussed in section 8.2 of this report, which finds that the effects of the plan change on Great South Road will not be significant, and that the immediate network will continue to perform satisfactorily.

314. Submissions 13.2 and 13.3 from Auckland Transport relate to transport connections through the site and to surrounding land. These are discussed in section 8.4 of this report, which finds that these are not required to mitigate the effects of the plan change.
315. Submissions 13.1, 13.4 and 13.5 from Auckland Transport and submission 14.3 relate to transport improvements necessary to mitigate the effects of the plan change. These are discussed in section 8.3 of this report, which finds that
- a) Wider network improvements signalled in NZUP, ATAP, the LTP and RLTP, including the upgrade of Great South Road to an FTN standard, should ideally be in place to mitigate the off-site traffic effects of PC52. However, given the scale of the plan change and ;
 - b) Whilst the AUP(OP) framework could be relied on to provide for local improvements sought by AT, precinct provisions are recommended as they would provide greater certainty that such infrastructure is provided through PC52.
 - c) Local improvements to the site frontage, provision of pedestrian facilities and road widening to preserve an appropriate corridor width to accommodate a future FTN alignment on Great South Road can be achieved through resource consents under the Auckland-wide AUP(OP) provisions.

Recommendation

316. I recommend that submissions 4.1, 4.2, 11.1, 13.1, 13.4, 13.5, 14.3 and 15.1 and further submission 4 be **accepted in part**, to the extent that these matters can be addressed by the AUP(OP) provisions.
317. I recommend that submission 2.1, 3.1, 5.2, 6.1, 13.2, and 13.3 be **rejected**.
318. The amendments associated with this recommendation are outlined in **Appendix 6**.

16.2 Residential amenity and land use zoning

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further subs
1.1	Tingran	Approve the plan change without any amendments	-
2.1	Casey Norris	Decline the plan change as it will directly effect the submitters property outlook, value, sun light, drainage and traffic management.	FS02 - Support
3.1	Jamie Barry Mackenzie	Decline the plan change. <i>Submitter raises concerns regarding loss of privacy, sunlight, views and quietness due to 2-3 storey dwellings being constructed next to 516b Great South Road.</i>	FS02 - Support
6.1	Priyanka Hulikoppe	Decline the plan change.	FS02 - Support
14.1	David and Sarah Bryant	Decline the plan change, but if approved, make the amendments requested by the submitter	FS02 - Support

14.2	David and Sarah Bryant	Rezone to Residential - Mixed Housing Suburban	-
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Discussion

319. Submission 1.1 has submitted that they are interested to learn about this rezoning project.
320. Effects on residential amenity (submissions 2.1, 3.1, 6.1) are discussed in section 9.3 of this report. This assessment finds that whilst the MHUZ will result in a change in amenity values in the area, the effects of bulk and location associated with taller buildings (2-3) can be mitigated through the MHUZ provisions.
321. The zoning selection (submissions 14.1 and 14.2) is also discussed in section 9.3 of this report, which outlines that the zoning proposed under PC52 is consistent with the land uses anticipated by the Drury-Opāheke Structure Plan. The indicative zoning of the PC52 land and surrounds as MHUZ reflects the structure plan's policies on residential areas, which are to focus medium and higher densities near major public transport facilities and near or in centres⁶⁰.

Recommendation

322. I recommend that submission 1.1 be **accepted in part**.
323. I recommend that submissions 2.1, 3.1, 6.1, 14.1 and 14.2 be **rejected**.
324. There are no amendments associated with these recommendations.

16.3 Cumulative effects and consideration of the wider area

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further subs
5.1	Judy and Peter Coleman M & J Coleman	Seeks that the entire area should be looked at as a whole as this would be better for the environment and would allow better planning for its community as per comments in submission.	-

Discussion

325. Submission 5.1 from Judy and Peter Coleman is concerned with the PC52 signalling further piecemeal development east of Great South Road between Coulthard Terrace to the Slippery Creek bridge in the south. The submitters are particularly concerned with effects of stormwater runoff from such development on Slippery Creek and the provision of social infrastructure including cycleways, walkways and parks in the area. The submission considers that:

This area should not be piecemeal developed as it will destroy the community and end up with areas that do not interconnect or relate to each other.

326. Ms Mein has assessed the submission for Council, and considers that from an urban design perspective, social infrastructure would ideally be advanced prior to residential

⁶⁰ p. 15, section 3.5 Residential Areas, Drury-Opāheke Structure Plan

development. However, Ms Mein's concerns are assuaged given that the plan change area is contiguous with the existing settlement, and that the DOSP has established a framework for the wider area.

327. I agree with Ms Mein, in that the wider assessment of how the Drury-Opāheke area should be urbanised and what supporting infrastructure is required, is identified in the DOSP. The comprehensive planning of the Drury area has been undertaken through the Drury-Opāheke Structure Plan, which sought to identify land uses, supporting infrastructure and key environmental constraints in proposing a high level masterplan for the area.
328. In addition, I note that the applicant has addressed the more localised context of the PC52 site and surrounds in their own masterplanning within the UDA. In my view, this information is sufficient to understand how the proposal will integrate with pedestrian and cycle connections and open spaces, including potential future neighbourhood parks.

Recommendation

329. I recommend that submission 5.1 be **rejected**.
330. There are no amendments associated with this recommendation.

16.4 Effects on the Papakura South Cemetery

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further Subs
5.2	Judy and Peter Coleman M & J Coleman	Oppose the parcel of land being rezoned Mixed Housing Urban.	-

Discussion

331. Effects on the Papakura South Cemetery are discussed in Section 13 of this report in relation to parks and open spaces. This finds that development of the paper road west of the cemetery, and retention of the existing stream south of the cemetery, will likely provide separation between future residential development and the cemetery.

Recommendation

332. I recommend that submission 5.2 be **rejected**.
333. There are no amendments associated with this recommendation.

16.5 Heritage New Zealand Pouhere Taonga - Archaeology

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further submissions
12.1	Heritage New Zealand Pouhere Taonga	Approve the plan change with the amendments requested.	-

12.2	Heritage New Zealand Pouhere Taonga	Seeks that the plan change not be approved until such time as an archaeological assessment/field survey has been completed by an appropriately qualified archaeologist.	FS02 - Support
12.3	Heritage New Zealand Pouhere Taonga	Seeks that the plan change not be approved until such time as the plan change is amended as appropriate in response to the assessment to avoid effects on any identified archaeological sites in the first instance.	FS02 – Support FS04 – Oppose (Wainono)

Discussion

334. The HNPT submission is discussed in section 15 of this report, which finds that an archaeological assessment is not required to approve PC52 and that the accidental discovery protocol standards in the AUP(OP) can be relied upon should subsurface material be discovered.

Recommendation

335. I recommend that submissions 12.1 – 12.3 and further submission 2 be **rejected**.

336. I recommend that further submission 4 be **accepted**.

337. There are no amendments associated with this recommendation.

16.6 Water and wastewater servicing

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further subs
10.1	Veolia Water Services	Seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.	FS04 (Wainono Investments Limited) - Oppose
10.2	Veolia Water Services	Seeks that the existing water infrastructure is modelled to ensure sufficient capacity. Should there be insufficient capacity, it is the responsibility of the Applicant to, at its cost, design and construct required network infrastructure upgrades.	FS04 – Oppose
10.3	Veolia Water Services	Seeks that the wastewater disposal from the Plan Change Area is required to be connected to the public wastewater network, discharging to the Slippery Creek Wastewater Pump Station, Motorway Wastewater Pump Station and across State Highway 1 to the Hingaia Wastewater Pump Station.	FS04 - Oppose
10.4	Veolia Water Services	Seeks that the Applicant will, at its cost, design and construct:	FS04 - Oppose

		<p>i. any wastewater infrastructure required to enable the connection of the Plan Change Area to the public wastewater disposal and collection system</p> <p>ii. any water infrastructure required to enable the connection of the Plan Change Area to the public retail water network.</p>	
10.5	Veolia Water Services	Seeks that the Applicant obtains approval from Veolia for the connection points to the local network to service the Plan Change Area.	FS04 - Oppose

Discussion

338. Submission 10 and further submission 4 are discussed in Section 11 of this report in relation to water supply and wastewater effects.

Recommendation

339. I recommend that submission 10.2 be **accepted in part**, in that further evidence is provided by the applicant to demonstrate that sufficient water capacity is available in the public network to service development enabled by PC52.

340. I recommend that submissions 10.1 and 10.3-10.5 and further submission 4 be **accepted in part**.

341. There are no amendments associated with this recommendation.

16.7 Effects on Mana Whenua

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further subs
8.1	Ngāti Te Ata Waiohua	Reject the Application on the basis that there has been a lack of iwi consultation, engagement and consideration of the Submitter's cultural preferences resulting in a failure to give effect to sections 6(e), 6(f), 7(a) and 8 of the RMA.	FS3 Ngāti Tamaoho Trust - support

Discussion

342. Ngāti Te Ata Waiohua's submission is discussed in section 14 of this report. This finds that consultation with iwi was undertaken in accordance with Clause 4A to Scheduled 1 RMA. The submitter's interest is most likely to be related to stormwater and archaeology/heritage, which have been assessed elsewhere in this report. However, the submitter's cultural preferences cannot be assumed, and therefore this should be addressed by Ngāti Te Ata Waiohua through evidence.

Recommendations on Submissions

343. I recommend that submission 8.1 and further submission 3 be **accepted in part**, and that approval of PC52 is dependent on the findings of evidence provided by Ngāti Te Ata Waiohua and/or Ngāti Tamaoho Trust.

344. There are no amendments associated with this recommendation.

16.8 Access to parks and open spaces

Submissions and further submissions

Sub. No	Submitter Name	Summary	Further subs	Planner Recommendation
7.1	Julia Marr	Approve the plan change with the amendments.	-	Accept in part
7.2	Julia Marr	Seeks for less dwellings to allow for community space within this new development and more parking.	-	Accept in part

Discussion

345. The access to open space and parks is addressed in section 13 of this report, which finds that the site is served by a neighbourhood park, suburban park and the cemetery site. In particular, the effects of unsafe pedestrian access to the neighbourhood park at Parkhaven Drive / Drumkeen Place can be mitigated through the provision of a pedestrian facility on Great South Road, near the Road 1 intersection.

Recommendation

346. I recommend that submission 7.1 and 7.2 be **accepted in part**.

347. There are no amendments associated with this recommendation.

16.9 Stormwater management and other submissions

Submissions

Sub. No	Submitter Name	Summary	Further subs
5.2	Judy and Peter Coleman	Oppose the parcel of land being rezoned Mixed Housing Urban.	-
9.1	Lee & Gary Running	If the proposed plan change is not declined, than it be amended as outlined below.	-
9.2	Lee & Gary Running	Seeks that when infrastructure planning is being done/considered for 520 Great South Road and 21 Gatland Road, that there be consideration for future capacity and access to a storm water connections at 9 & 11 Gatland Road to be connected to.	-

Discussion

348. Submission 5.2 is concerned about stormwater effects on Slippery Creek, which they note is unstable highly prone to erosion. They also note that the creek and immediate environs sustain ecosystems including fauna and flora, and that children also swim in the creek. Therefore, the submitter considers the protection of this ecosystem to be paramount.

349. Ms Trenouth notes that Healthy Waters agrees with the submitter in that the wider area needs to be considered when the assessing stormwater effects of the plan change. As outlined in section 10 of this report, Ms Trenouth considers that the SMP achieves this in the stormwater mitigation measures proposed, but that the plan change provisions do not adequately ensure that this approach can be implemented. As such, Ms Trenouth recommends applying the following:
- a) Stormwater Management Area – Flow 1 control to manage water quantity/hydrology
 - b) Precinct provisions to manage water quality effects, and to supplement the SMAF 1 control with specific water quantity provisions requiring the implementation of the SMP approach and a stormwater treatment chain.
350. For the reasons discussed in section 10 of this report, I support the application of the SMAF 1 control to the site to manage water quantity, and precinct provisions to manage water quality and quantity.
351. Submission 9.1 and 9.2 seeks to extent stormwater connections to 9 and 11 Gatland Road once the site is developed. 9 Gatland Road abuts the western boundary of the plan change area. As outlined in section 10 of this report, the applicant proposes to construct a public network on the site to accommodate primarily flows generated up to a 1 in 10 year ARI storm. In my view, the extension of this network to the submitter's land is not a resource management matter to be addressed by the plan change, and if resolved should be done so through a private agreement between the submitter and 520 GSR Ltd.

Recommendations

352. I recommend that submissions 1.1, 5.2, 9.1 and 9.2 be **accepted in part**.
353. The amendments associated with this recommendation are outlined in **Appendix 6**.

17. CONCLUSION

354. PC52 seeks to rezone land at 520 Great South Road, 522 Great South Road and 21 Gatland Road, Papakura from Future Urban Zone to Residential – Mixed Housing Urban Zone in the AUP(OP).
355. An assessment of effects has been undertaken, supported by a peer review from relevant specialists. This assessment finds that the effects of PC52 can be appropriately mitigated by the PC52 provisions, subject to amendments outlined in this report.
356. Submissions have been received in support of and in opposition to PC52, are on a range of matters, principally transport infrastructure funding delivery and connections, residential amenity, mana whenua, water and wastewater servicing, stormwater management and access to parks and open space.
357. In terms of the statutory and policy context, PC52, as proposed to be modified through this report:
- will assist the council in achieving the overall purpose of the Resource Management Act 1991
 - will give effect to the relevant National Policy Statements and the AUP(OP) Regional Policy Statement; and
 - is consistent with the Auckland Plan.

358. Having considered all of the submissions and reviewed all relevant statutory and non-statutory documents, having had regard to all statutory obligations including those under sections 32 and 32AA of the Resource Management Act 1991, I recommend that Proposed Plan Change 52 (Private) 520 Great South Road should be approved.

18. Section 32AA analysis of recommended changes

359. The changes recommended above require an additional assessment in accordance with S32AA of the RMA.

360. This further evaluation is only made in respect of the changes I have proposed in Appendix 6 to this report and discussed above and is at a level of detail which, in my opinion, corresponds to the scale and significance of the proposed changes.

361. I recommend that PC52 is modified as follows:

- a) Application of the SMAF 1 Control to the PC52 site;
- b) Application of a new precinct to the PC52 site to manage stormwater quality and quantity and to provide for the delivery of specific transport improvements.

Table 6: Section 32AA assessment of proposed modifications to PC52

Matter	Option 1 – Underlying AUP(OP) provisions (excluding SMAF 1)	Option 2 – SMAF 1 and precinct provisions
Stormwater quality and quantity	<p><u>Effectiveness</u></p> <p>Chapter E8 manages stormwater discharges and diversions, and does not require retention or detention, except for specific activities.</p> <p>Chapter E9 of the AUP(OP) manages contaminants from high contaminant generating car parks and high use roads and, which are not located in the PC52 site.</p> <p>The AUP(OP) framework therefore does not require the SMP recommendations to be implemented as they relate to:</p> <ul style="list-style-type: none"> • Stormwater retention and detention • Using inert building materials on residential lots • Treatment of stormwater from local roads and JOALs. <p>In addition, under this option there is limited scope for council to assess the design and location of stormwater devices in the road, and limited scope to impose appropriate consent</p>	<p><u>Effectiveness</u></p> <p>Provides for the treatment of stormwater quantity through the SMAF 1 control.</p> <p>Provides for water quality treatment from residential lots and roads through precinct provisions requiring the use of inert buildings materials and encouraging treatment of stormwater from local roads and jointly owned access lots.</p> <p>This option better gives effect to RPS B7.3 and B7.4 as it is more likely to minimise adverse effects on freshwater, and better gives effect to the NPSFM, as it better gives effect to Te Mana o te Wai⁶² (Policy 1), provides for integrated management on a whole of catchment basis (Policy 3)</p> <p><u>Efficiency</u></p> <p>More efficient as whilst it will impose greater costs associated with implementing stormwater</p>

⁶² As defined by NPSFM Clause 1.3(1)

	<p>conditions requiring the SMP recommendations to be implemented. Therefore, this option does not give effect to:</p> <ul style="list-style-type: none"> • RPS B7.3, which seeks to avoid, remedy or mitigate effects from change in land use on freshwater⁶¹, including by controlling discharges to minimise the effects of runoff (Policy B7.3.2(1)(c)) • RPS B7.4, which seeks to minimise adverse effects on freshwater and coastal water and adopt BPO for every stormwater diversion or discharge (Policy B7.4.2(9)) • NPS-FM, which seeks to achieve Te Mana o te Wai (Policy 1) and integrated management on a whole catchment basis (Policy 3) <p><u>Efficiency</u></p> <p>Not as efficient as it is less likely to achieve the purpose of PC52 and the RMA.</p>	<p>mitigations, it better gives effect to the purpose of PC52 and the RMA.</p>
<p>Transport improvements</p>	<p><u>Effectiveness</u></p> <p>Relying on Chapter E27 and E38 to the AUP(OP) provide less certainty that local improvements will be delivered, and that an appropriate corridor width on Great South Road will be retained for future road widening. Therefore, this approach is less effective in achieving the RPS B3.3.</p> <p>B3.3 seeks to integrate transport infrastructure with adjacent land uses and provide effective and pedestrian and cycle connections (B3.3.2(4)) and improve the integration of land use and transport by ensuring transport infrastructure is planned, funded and staged to integrate with urban growth.</p> <p><u>Efficiency</u></p> <p>Not as efficient as it is less likely to achieve the purpose of PC52 and the RMA.</p>	<p><u>Effectiveness</u></p> <p>Precinct provisions identifying the local improvements required (through subdivision assessment criteria) would provide greater certainty that such improvements will be provided. These include the upgrade of the Great South Road frontage to an urban standard, provision of pedestrian connections, and provision for future widening of Great South Road.</p> <p>This approach is considered more effective in giving effect to RPS B3.3, as it provides greater certainty that future land uses will be integrated with local transport infrastructure, and that an effective pedestrian connection (along the site frontage, and from the site to the footpath on the western side of Great South Road).</p>



⁶¹ Objective B7.3.1(3)

		<p><u>Efficiency</u></p> <p>More efficient as whilst it is likely to impose greater costs associated with implementing transport improvements, it better gives effect to the purpose of PC52 and the RMA.</p>
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19. RECOMMENDATIONS

362. I recommend that, the Hearing Commissioners accept or reject submissions as outlined in this report.
363. It is recommended that PC52 be approved, subject to the following modifications, which have been considered under section 32AA of the RMA:
- a) Application the Stormwater Management Area Flow 1 control to the PC52 site.
 - b) Application of precinct provisions to manage stormwater quality and quantity and to require local transport improvements to be implemented.
364. However, this is dependent on the findings of the following evidence, should it be provided:
- a) Evidence to determine that sufficient water capacity is available in the reticulated network to service the site; and
 - b) Evidence from submitter Ngāti Te Ata Waiohua and further submitter Ngāti Tamaoho Trust outlining their cultural preferences in regard to PC52.

20. SIGNATORIES

Name and title of signatories	
Author	 Sanjay Bangs, Senior Policy Planner, Central and South Planning
Reviewer	 Craig Cairncross, Team Leader, Central and South Planning

APPENDIX 2

SUBMISSIONS AND FURTHER SUBMISSIONS

SUMMARY OF DECISIONS REQUESTED TABLE

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 52 (Private) - Tingran
Date: Sunday, 6 September 2020 12:15:39 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tingran

Organisation name:

Agent's full name:

Email address: tingran.duan@gmail.com

Contact phone number: 0210628283

Postal address:

1041

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:
none

Property address: none

Map or maps: none

Other provisions:
none

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
just interested to learn about this rezoning project

1.1 | I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 6 September 2020

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 52 (Private) - Casey Norris
Date: Saturday, 12 September 2020 11:16:07 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Casey Norris

Organisation name:

Agent's full name:

Email address: cnorris@ljhtakanini.co.nz

Contact phone number:

Postal address:
3/516 Great South Road
Papakura
2113

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:
Plan change

Property address: 520, 522 Great South Road & 51 Gatland Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
It will directly effect my property outlook, value, sun light, drainage.
Traffic management.

2.1

I or we seek the following decision by council: Decline the plan change

Submission date: 12 September 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Contact details

Full name of submitter: Jamie Barry Mackenzie

Organisation name:

Agent's full name:

Email address: jamie.mackenzie@live.com

Contact phone number:

Postal address:
516b Great Sout Road
Rosehill
Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:

Property address: PC52 (Private): 520 Great South Road, Papakura - 522 Great South Road, Papakura and 21 Gatland Road, Rosehill

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

My partner and I have been living in our home since December 2017. A big factor in us buying our home was the semi rural outlook we have with the views of the Drury Hills, also the amount of the property got and the quietness of no other houses behind us. Prior to buying our home there was no mention of the land behind our home being subdivided and home homes built on it, if we were made aware of this we would not have brought where we did.

My partner and I along with our surrounding neighbors strongly oppose the future mixing housing urban development at 520 Great South Road and the adjoining site at 522 Great South Road and 21 Gatland Road, Rosehill.

The proposed 113 dwellings for the development is far too many for the land size which will mean that the houses will be crammed in, and the houses will be 2-3 story dwellings. Our current views will be completely gone with these houses going in and instead we will be looking at a 2-3 story dwellings that will all look the same and the houses literally crammed in side by side. We will no longer have

any privacy with these houses being up high and looking down on our home and houses being in close proximity to our fence line. We will also lose out on the sun that we get during the morning which will now be blocked out by these houses.

During peak times along Great South Road traffic can be noisy, however with these proposed new houses this will be even worse with more vehicles on the road causing traffic issues and increased noise coming from the houses which will cause ongoing issues. My partner and I are both shift workers and the majority of the time working night shifts and the construction that will be going on for a significant period of time will be a nuisance. The amount of construction that will be going on will also cause structural movement of the house and damage to our house foundations which is not covered under any insurance policy.

My partner and I along with our surrounding neighbors are all strongly opposed to this development, we wish that you take this submission into consideration.

3.1 | I or we seek the following decision by council: Decline the plan change

Submission date: 15 September 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Contact details

Full name of submitter: Chris Caldwell

Organisation name:

Agent's full name:

Email address: ccaldwell@xtra.co.nz

Contact phone number: 021818376

Postal address:
39 Manuwai Lane
Drury RD 2
Auckland 2578

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Safety considerations for proposed intersection with Great South Road.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The plan change is consistent with the structure plan for the area I believe, however, the new intersection should be enhanced with a safety lane provided on Great South Road to allow right turning traffic onto Great South Road a safety lane from which it can merge into the full traffic flow. Great South Road is already busy and with the existing and proposed projects will become even busier, therefore right turning options will need to become more robust. I have attached a schematic diagram of what I am proposing.

4.1 | I or we seek the following decision by council: Approve the plan change with the amendments I requested

4.2 | Details of amendments: Upgrade the safety provisions for the proposed intersection

Submission date: 17 September 2020

Supporting documents
GSR - Intersection layout_1.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

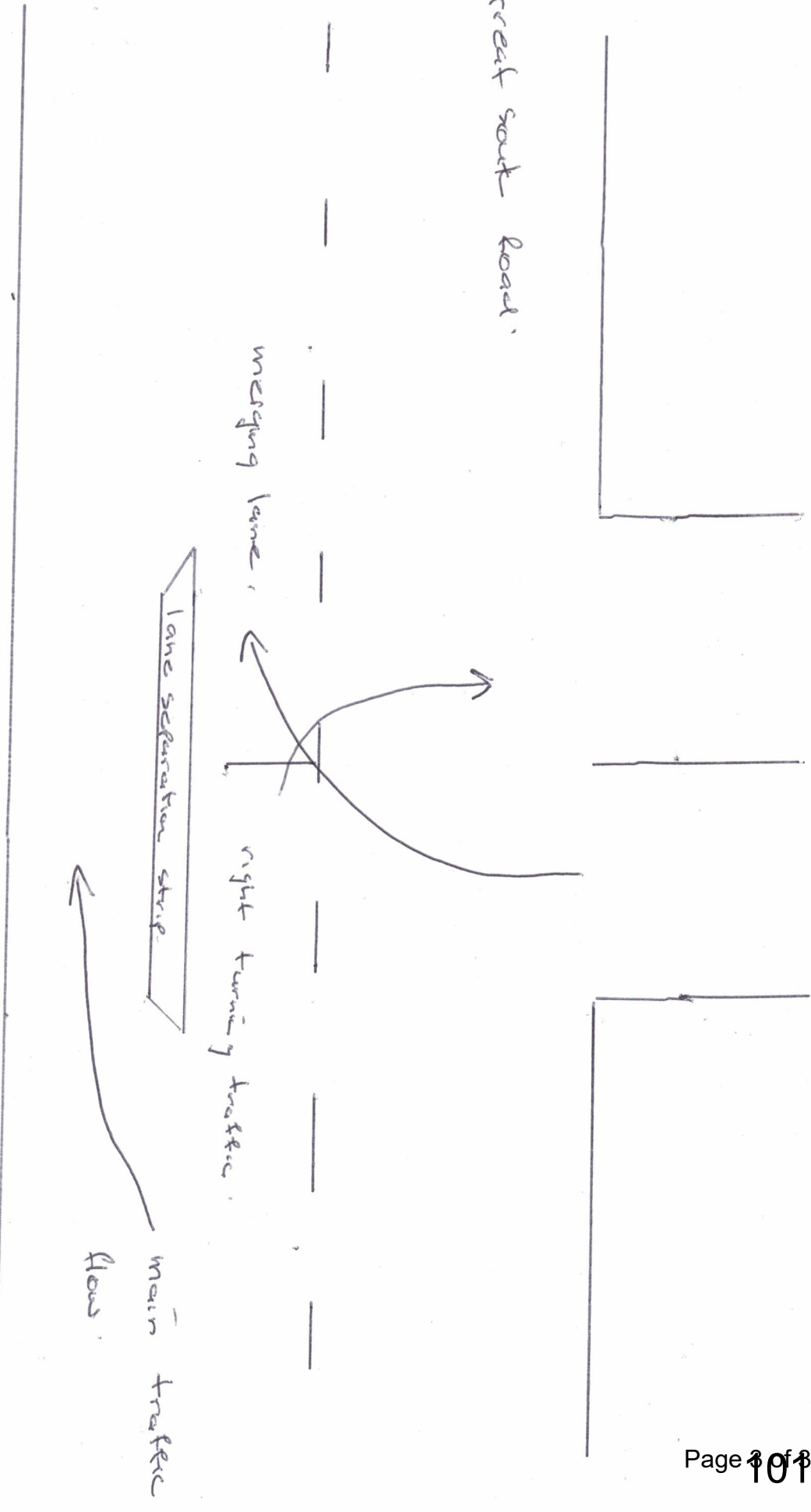
- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

New intersection

Great South Road



To whom it may concern,

Re. Private Plan Change 52

520-522 Great South Road

Papakura and,

21 Gatland Road

Papakura

We would like to oppose the above development.

Reasons:

1. The area to the East of Great South Road from Coulthard Terrace to the Slippery Creek bridge is an area that needs to be looked at as a “whole”. It is a very special area as it is a parcel of land which drains into the creek. This area should not be piecemeal developed as it will destroy the community and end up with areas that do not interconnect or relate to each other. We need plans for cycleways, walkways and parks in this area.
 2. All the stormwater eventually heads to Slippery Creek. This creek is unstable and is very prone to erosion. It has many native eels in it. Children also swim in this creek. The protection of this ecosystem which is the waterway in this catchment is paramount.
 3. The cemetery is a private sensitive area and the development surrounding this needs to be very carefully done. People visiting the cemetery require privacy and should not have homes overlooking this very private place.
 4. The mental health affects to those who have lived in this area for generations needs to be considered and so along with the “newer” members of the community everyone’s opinions and ideas should be sought.
 5. All “other” Drury development will create huge infrastructure problems in the area. The Great South Road is already a “nightmare” to negotiate. The connecting road at the bottom of Gatland Road has obviously been ill considered as this road will be eroded in every creek overflow (and there can be 7 overflows in any one year), where the water flows at dangerous speeds and would require a huge bridge about 800m in length to negotiate this. There are also 400-year-old Totaras in this area which require protecting.
- 5.1 | We propose that the entire area should be looked at as a whole as this would be better for the environment and would allow better planning for its community.
- 5.2 | Therefore, until this can be organised with all the parties involved, we oppose the parcel of land above being rezoned Mixed House Urban.

Resource consent application is consequently rejected for the reasons above (and several others).

Thank you

Judy & P Coleman
117 Gatland Road

M & J Coleman
64 Gatland Road

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

PRIYANKA HULI KOPPE

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

518A GREAT SOUTH ROAD ROSEHILL

Telephone:

021 21 35108

Fax/Email:

skadole@yahoo.com

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 52

Plan Change/Variation Name

520 Great South Road, Papakura

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

520 Great South Road, 21 Gairland Road

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

The reasons for my views are: I have attached detailed my view & facts with this submission.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

6.1

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

[Signature]

Signature of Submitter
(or person authorised to sign on behalf of submitter)

21/09/2020

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

Dear Sir/ Madam,
Following are the reasons for my views.

There is no open space zoning proposed saying 2 nearby parks available. Suburban park on Opaheke road is not directly accessible from the 520 great south road or 21 Gatland road. People need to drive for 4kms around to get to that park. People need to cross the busiest great south road to get to park on Drumkeen Place and this Park is small and already catering for Park haven residents.

There is a paper road joining Gatland road to Opaheke road in the plan. The chances of this road getting built is nil, unless council / government spends millions of dollars to build a heightened proper bridge and road across the "Otuwairoa stream/slippery creek". As per the local residents, this creek floods 6 to 7 times a year and normal small bridge or a road can not withstand the floods. There is a 400 year old tree in the way of this planned road. So this road needs to be only considered for changing the plan if it actually exists.

6.2 | This creek separates the area 470-600 Great south road from the actual drury center and planned train station. This whole area needs to be developed together and considered together to development rather than rezoning the small patches.

There is no community space planned. It will be packed with houses and residents will lack the common community space.

All the eateries, laundromats, grocery shops etc. are not within the walking distance from the current proposed rezoning place. Most of the current people drive to Papakura center to get these day to day facilities. So, if you are zoning to urban and building 113 houses, then all the new residents need to commute to get these things, which will increase tremendous flow in traffic and cause nuisance.

As a suburb Drury is not ready yet to cater for urban setup. Infrastructure, public transport, community spaces, parks need to be in place before you change the zone.

6.3 | There should be some open space (gaps) between urban and suburban zones or else privacy of suburban zoned houses are at risk and all the Suburban zoned houses will miss out from the morning sun.

We as a family (myself, my husband, daughter, father in law and mother in law) have bought this house recently in February 2020. A big factor in us buying our home was the semi-rural outlook we have with the views of Drury hills, the amount of sun the property got and the quietness of no other houses behind and side to us. Prior to buying our home there was no mention of the land behind and side to our home being subdivided and homes built on it, if we were made aware of this we would not have brought where we did.

We all along with our surrounding neighbors strongly oppose the future mixed housing urban development at 520 Great South Road and the adjoining site at 522 Great South Road and 21 Gatland Road, Rosehill.

The proposed 113 dwellings for the development is far too many for the land size which will mean that the houses will be crammed in, and the houses will be 2-3 story dwellings. Our current views will be completely gone with these houses going in and instead we will be looking at 2-3 storey dwellings that will all look the same and houses literally crammed side by side. We will no longer have any privacy with these houses being up high and looking down on our home and houses being in close proximity to our fence line. We will also lose out on the sun that we get during the morning which will now be blocked out by these houses.

There is not enough public transport available. It has mentioned about Papakura train station and its parking capacity in the assessment report. But this train station already caters for Papakura, Rosehill, Drury, Redhill, Karaka, Opaheke etc. Drury train station is in the plan but there is no guarantee of it operational in a few years. So, it does not feel right to have houses built before proper public transport available.

During peak times along Great South Road traffic can be noisy, however with these proposed new houses this will be even worse with more vehicles on the road causing traffic issues and increased noise coming from the houses which will cause ongoing issues. Construction that will be going on for a significant period of time will be a nuisance. The amount of construction that will be going on will also cause structural movement to our house and damage to our house foundations which is not covered under any insurance policy.

Our whole family along with our surrounding neighbors are all strongly opposed to this development, we wish that you take this submission into consideration.

If any of you at the Auckland Council were in our position, I guarantee you that you would feel exactly the same way as we do.

Contact details

Full name of submitter: Julia Marr

Organisation name:

Agent's full name: Julia Marr

Email address: julia@jmarrphysio.co.nz

Contact phone number: 021 934905

Postal address:
J Marr Physiotherapy
P O Box 11
Drury
Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:

Property address: This private plan change aims to rezone the land at 520 Great South Road and the adjoining sites at 522 Great South Road and 21 Gatland Road from Future Urban zone to Mixed Housing Urban.

Map or maps:

Other provisions:
PC-56 Appendix 3,4 and 5

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Concern about the lack of parking available to residents within the new development would mean they will park on Great South Road.

Lack of village green where people could get to know their neighbors

7.1 | I or we seek the following decision by council: Approve the plan change with the amendments I requested

7.2 | Details of amendments: Less dwellings to allow for community space within this new development and more parking

Submission date: 22 September 2020

Supporting documents
PC52 Submission.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

PC 52 (Private): 520, 522 Great South Road, 21 Gatland Road, Papakura

I am excited about the provision of new housing and the improvement to my neighbourhood with the quality build at the above address.

Please consider the following:

- Safe Green Space
- Safe Parking

My concern is the lack of green or village space provided within this environment at this stage of the unitary planning and development. There is a park in Drumkeen Place, Parkhaven which meets requirements for this development to go ahead. Has anyone considered that the children and families will need to cross the main arterial route of Great South Road which at times is a very busy road. I frequently cross this road to walk my two dogs around Parkhaven and it is a precarious task. I often need to break into a run to make it across the road safely and do not consider this to be a safe practice for young families.

The unitary plan has further parks planned (shown in Figure 5 of the PC52 – labelled as 3) and shows the Opaheke Park. This park is 41 minutes walk away at this present time but the future access road will enable that walking time to be reduced to a few minutes. What a wonderful space this will be for all residents of this area but it would appear that the Future Urban Land Supply Strategy 2017 states that this plan change will not be “development ready” until 2028 – 2032. This is a long time for current and future residents to wait for social space when they are living in such high density housing. Potentially 8-12 years. Half a lifetime of a child’s developmental years.

I do believe that the green space adjacent to the intended development will be utilised by the residents in the early stages as it is easy to access and requires no road crossing. This is the Papakura South Cemetery. Not really a place where young children, adolescents and young adults should be hanging out.

My other concern is the apparent lack of parking for the terraced housing. I am unable to determine from the plan whether the rear access behind the terraced housing will have designated parking here. If the terraced housing along Great South Road were to park on Great South Road they will be creating congestion, pull out hazardous and hair raising parking

manoeuvres or have young children getting in and out of cars where there is not only high traffic flow but large machinery transportation. The oversize transportation that is not permitted to use the motorway all come past this area and require a wider section of road to enable other large vehicles to move in opposing directions. Will Great South Road need to be widened in the future? Has any consideration been taken to offer a layby for residents and their visitors to pull off the main road to safely access parking?

This leaves Gatland Road for the overflow parking. Has the council considered that this is already used as a public space for the Papakura South Cemetery parking? What will happen when the space is required for the frequent large funerals that are attended at this cemetery. Parking for funerals frequently fills all the currently marked spaces, the opposite side of the road and will often extend up Gatland Road towards Great South Road. Where will funeral goers park when there is no allocated parking remaining for them?

It has become a new culture to depart the cemetery grounds in a vehicle using a lose of tyre traction technique in respect for the dead. Gatland Road is covered in skid marks in evidence of this. I have seen cars lose traction then lose control of their vehicle and slam into the brick wall. Evident in the number of loose rocks that have come out of the wall from the high impact. Add children playing on the footpath, riding their bikes up and down the road, walking their pets along Gatland Road and we have a recipe for disaster. I have written to the council previously to request a review of the yellow parking half rounds that were bolted to the road as a temporary measure to deter skidding cars. I received no reply. These half rounds were a temporary measure put in place more than 10 years ago and are now breaking apart and disintegrating.

I think this new housing will be fantastic in offering new housing for people in an area like Drury which is a wonderful place to live. This is a great opportunity to look long term and make this an amazing place to live.

Lets no cock it up!

Thank you so much for reading through my submission. I appreciate your time

Julia Marr



NGĀTI TE ATA

“Ka whiti te ra ki tua o rehua ka ara a Kaiwhare i te rua”

23rd September 2020

AUCKLAND UNITARY PLAN: SUBMISSION ON PLAN CHANGE 52 (PRIVATE) 520 GREAT SOUTH ROAD, PAPAURA

To: Auckland Council

Auckland Council
Unitary Plan
Private Bag 92300
Auckland 1142

Attention: Planning Technician

Name of Submitter: Ngāti Te Ata (the **Submitter**)

INTRODUCTION

1. This is a submission on proposed Plan Change 52 (Private): 520 Great South Road, Papakura. Proposed Private Plan Change 52 seeks to rezone 520 and 522 Great South Road and 21 Gatland Road, Papakura from Future Urban to Residential – Mixed Housing Urban
2. The Submitter could not gain an advantage in trade competition through this submission.
3. This submission relates to the entire Application; however, the Submitter is particularly interested in iwi consultation, engagement and consideration of the Submitter’s cultural preferences arising from PPC52.
4. The Submitter opposes the Application on the basis that sections 6(e), 6(f), 7(a) and 8 of the Resource Management Act 1991 (**RMA**) have not been adequately met, and on the basis that the Submitters were not adequately consulted on the Application.

BACKGROUND

5. Ngati Te Ata are one of the main mana whenua groups in the Papakura-Drury area. Within the wider landscape of Tamaki Makaurau (Auckland) lay the settlements of the Te Waiohua people (the original inhabitants). Members of the Tainui waka settled around the isthmus and began to intermarry with the ancestors of Te Waiohua. It was this intermarriage and the development of other bonds between the people that settlement established in Papakura-Drury. Ngati Te Ata descend from both groups. As the descendants (current generation) Ngati Te Ata are kaitiaki and have inherent responsibilities to ensure that they can protect and preserve their taonga for future generations.

REASONS FOR SUBMISSION

6. The Submitter considers that the Application is inconsistent with Part 2 of the RMA, specifically:
 - (a) Section 6(e) which states that the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers is to be protected from inappropriate subdivision, use and development;
 - (b) Section 6(f) which states that historic heritage is to be protected from inappropriate subdivision, use and development;
 - (c) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga;
 - (d) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
7. Of specific concern to the Submitters is the lack any real iwi consultation engagement, or consideration of the Submitter's cultural preferences when developing the plan change. Consultation would have enabled the Submitter to contribute to the development of the plan change and assist the Applicant to ensure that it gave appropriate effect to Part 2 of the RMA and Mana Whenua design principles.
8. Established Treaty principles emphasise tribal rangatiratanga, the active protection of Maori people in the use of their lands, waters and other taonga, and the duty to consult with Maori.
9. Partnership requires a duty to interact in good faith and in the nature of a partnership. There should be a sense of shared enterprise and mutual benefit where each partner must take account of the needs and interests of the other.
10. Redress is the obligation to remedy past breaches of the Treaty. Redress is necessary to restore the honour and integrity of the Treaty partner, and the mana and status of Māori, as part of the reconciliation process. The provision of redress must also take account of its practical impact and the need to avoid the creation of fresh injustice. While the obligation of redress sits with the Crown and Auckland Council (through Council), which has a role in the implementation of redress at the

regional and local level, the applicant also has a role in a more collaborative approach with iwi in a mutually beneficial negotiated way in light of PPC52. This, however, has not occurred.

11. Examples of how the Applicant could have successfully engaged with the Submitters include:
- (a) Initiating a comprehensive engagement process with Ngati Te Ata who wished to engage in the plan change process, including **undertaking a cultural values-impact assessment report**. Ngati Te Ata as mana whenua have the ability to work collaboratively with the Applicant; and
 - (b) Incorporating Te Aranga Design Principles and other key design themes and principles into the design and layout of the proposed plan change; and
 - (c) Incorporating Mana Whenua principles into fresh water solutions on the site, including riparian reserves and public access open space in stormwater management areas.

DECISION SOUGHT

8.1

12. The Submitter seeks the following decision from Auckland Council:
- (a) Reject the Application on the basis that there has been a lack of iwi consultation, engagement and consideration of the Submitter's cultural preferences resulting in a failure to give effect to sections 6(e), 6(f), 7(a) and 8 of the RMA.
13. The Submitter wishes to be heard in support of its submission.
14. The Submitter would consider presenting a joint case if others make similar submissions.

23rd September 2020



Karl Flavell
 On behalf of Ngāti Te Ata
 Electronic address for service of submitter: karl_flavell@hotmail.com
 Telephone: 0279328998
 Postal address: Po Box 437, Pukekohe 2340.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Lee + Gary Running

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

70 Firth St, Dnny

Telephone:

021 759749

Fax/Email:

Sales@atlas movers.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 52

Plan Change/Variation Name

520 Great South Road, Papakura

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

* pls see over for explanation

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

The reasons for my views are: We own 2 adjacent properties that will be developed in the future.

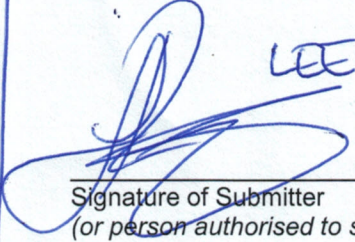
(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation

9.1 If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

 LEE RUNNING
 Signature of Submitter
 (or person authorised to sign on behalf of submitter)

23/9/20
 Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

9.2
 * When infrastructure planning is being done/considered for the property development at 520 Great South Rd & 21 Gatland Rd, could consideration please be given for future capacity and access to a storm water connection that 9 & 11 Gatland Rd (our properties) could connect to.



Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council
SUBMISSION ON: Plan Change 52 (Private) - 520 Great South Road, Drury
FROM: Veolia Water Services (ANZ) Pty Ltd
ADDRESS FOR SERVICE: sanjeev.morar@veolia.com
DATE: 23 September 2020

Veolia could not gain an advantage in trade competition through this submission.

1. INTRODUCTION

1.1. Background

On July 1, 1997 a 30-year franchise agreement commenced with the Papakura District Council to outsource operations of the water and wastewater networks in Papakura, Drury and Takanini to a Veolia, wholly owned subsidiary called United Water.

Around the globe, Veolia helps cities and industries to manage, optimize and make the most of their resources. The company provides an array of solutions related to water, energy and materials. Veolia's 174,000 employees are tasked with contributing directly to the sustainability performance of customers in the public and private sectors, allowing them to pursue development while protecting the environment.

- 100 million people supplied with drinking water

- 63 million people connected to wastewater systems
- 4,245 drinking water production plants managed
- 3,303 wastewater treatment plants managed^[s1]

In 2011, United Water was rebranded to Veolia, its parent company's name. This brand change brought the New Zealand operations in line with Veolia's global business.

Under the existing franchise agreement, Veolia is responsible for all aspects of the water and wastewater business including:

- Meter reading, billing and collection of revenue
- Customer services
- Operations and maintenance of the water supply and wastewater collection systems
- Planning, design and construction of new infrastructure

Papakura District Council was disestablished in 2010 with the creation of the Auckland Council as a unitary authority.

Auckland Council owns Watercare - a council organisation. All the water in the Papakura district is supplied by Watercare and all wastewater is treated at Watercare's Mangere Plant.

Watercare Services Ltd owns the water and wastewater infrastructure which is operated by Veolia.

2. SUBMISSION

2.1. General

This is a submission on a change proposed by 520 GSR Ltd to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 27 August 2020 ("**Proposal**").

The Applicant proposes to rezone 4.63 hectares of Future Urban land at 520-522 Great South Road and 21 Gatland Road, Drury,] to a Residential - Mixed Housing Urban ("**Plan Change Area**").

Veolia neither supports nor opposes the Proposal. The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on the existing and planned water and wastewater network are appropriately considered and managed in accordance with Resource Management Act 1991 ("**RMA**").

In making its submission, Veolia has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Taungahuru Te Mahere Taungahuru 2018 – 2028/The 10-year Budget Long-term Plan 2018 – 2028, the Auckland Future Urban Land Supply Strategy 2015 and 2017, the Water Supply and Wastewater Network Bylaw 2015 and the Water and Wastewater Code of Practice for Land Development and Subdivision. It has also considered the relevant RMA documents including the Auckland Unitary Plan (Operative in Part) and the National Policy Statement on Urban Development Capacity 2016 which (among other matters) requires local authorities to ensure that at any one time there is sufficient housing and business development capacity which:

- (a) in the short term, is feasible, zoned and serviced with development infrastructure (including water and wastewater);
- (b) in the medium term, is feasible, zoned and either:
 - (i) serviced with development infrastructure, or
 - (ii) the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act 2002; and
- (c) in the long term, is feasible, identified in relevant plans and strategies, and the development infrastructure required to service it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.¹

2.2. Specific parts of the Proposal

The specific parts of the Proposal that this submission relates to are: the proposed water and wastewater servicing arrangement and the effects of the Proposal on the existing and planned water and wastewater network.

Veolia has reviewed the Proposal but it is not in a position to confirm whether, in Veolia's opinion, the proposed servicing arrangement is appropriate. Specifically:

- (a) Water Supply - Network modelling to be undertaken to determine suitability of existing infrastructure to provide for proposed demand
- (b) Wastewater Network (gravity) - Availability of capacity to be determined pending discharge location
- (c) Wastewater Pump Station and Rising Main - Upgrades to be assessed for the existing Slippery Creek WWPS, Motorway WWPS and Motorway rising main.

2.2.1. Water supply

2.2.1.1. Water supply infrastructure

The two properties, 520 and 522 Great South Road, Drury are positioned with a public 150mm public watermain along their western boundaries. An existing 100mm public watermain is located along the northern boundary of 21 Gatland Road, Drury.

2.2.1.2. Water supply servicing for the Plan Change Area

In order to adequately assess the effects of the Proposal on the existing and planned water infrastructure network, the following further information regarding the proposed water supply servicing is required:

- (a) network modelling of the existing network with the additional demand proposed

¹ National Policy Statement on Urban Development Capacity 2016, policy PA1.

- (b) an assessment of the water infrastructure upgrades that might be required to service the development

The Applicant will be required to construct and fund any local network to service the Plan Change Area

For clarity, all of the water supply network relevant to the plan change is considered local network, and is therefore required to be funded by the developer.

2.2.2. Wastewater

2.2.2.1. Wastewater infrastructure

Currently, the Slippery Creek and Motorway wastewater pump stations are at capacity. There is some capacity available in the upstream gravity networks, however, capacity will vary location dependent.

2.2.2.2. Wastewater servicing for the Plan Change Area

It is proposed that the Plan Change Area be serviced via the existing gravity wastewater network, through to the existing Slippery Creek Wastewater Pump Station, to the Motorway Wastewater Pump Station, where wastewater is pumped via a rising main across State Highway 1, into the Bulk Hingaia Wastewater Pump Station.

Although there is limited capacity available in the gravity wastewater network, upstream of the wastewater pump stations, there is insufficient capacity available at both the Slippery Creek and Motorway stations. Capacity within the rising main from each station also requires assessment.

The Applicant will be required to construct and fund the local network upgrade to service the Plan Change Area.

This would require, at the cost of the Applicant, the design and construction of:

- (a) suitable gravity network discharge location. Should capacity be insufficient where the Applicant wishes to discharge, upgrades will be required
- (b) upgrade of the existing Slippery Creek and Motorway wastewater pump stations, including (but not limited to) storage and pump capacity
- (c) assessment of suitability of both the Slippery Creek and Motorway wastewater pump station rising mains - capacity and head losses to be determined pending proposed pump station upgrades

All upgrades are to be reviewed and agreed with Veolia.

3. DECISION SOUGHT

10.1

Veolia seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.

To enable that decision to be made, Veolia requests that:

- 10.2 | (a) Existing water infrastructure is modelled to ensure sufficient capacity. Should there be insufficient capacity, it is the responsibility of the Applicant to, at its cost, design and construct required network infrastructure upgrades.
- 10.3 | (b) Wastewater disposal from the Plan Change Area is required to be connected to the public wastewater network, discharging to the Slippery Creek Wastewater Pump Station, Motorway Wastewater Pump Station and across State Highway 1 to the Hingaia Wastewater Pump Station.
- 10.4 | (c) The Applicant will, at its cost, design and construct:
i. any wastewater infrastructure required to enable the connection of the Plan Change Area to the public wastewater disposal and collection system
ii. any water infrastructure required to enable the connection of the Plan Change Area to the public retail water network
- 10.5 | (d) The Applicant obtains approval from Veolia for the connection points to the local network to service the Plan Change Area.

4. HEARING

Veolia wishes to be heard in support of its submission.



Sanjeev Morar
Developments Manager

From: [Srinivas Reddyreddy](#)
To: [Unitary Plan](#); [Sanjay Bangs](#); steve.denize@terragroup.co.nz; Nui.McGregor@terragroup.co.nz
Subject: Fwd: Resource consent proposal for 520-522 Great south road
Date: Thursday, 24 September 2020 1:55:16 PM

Hello Planning team,

I would like to submit my objection which is proposed at 520 and 522 Great South Road , Papakura. This development will effect my newly proposed drive way and the meadian strip which was approved by the Auckland transport for 541 Great south Road which is opposite to 520 Great south road.

New development at 520 Gerat south road directlyl affect our entry point of the site. You can see in the picture below. The waiting queue to get in their development will obstruct the traffic movement getting into our site. This will create unsafe traffic movement to our site.



Figure 8
Proposed intersection on Great South Road - concept layout

Kind Regards

Srini Reddy

021 222 7233.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Srinivas ReddyReddy

Organisation name: Elders Homecare Ltd

Agent's full name:

Email address: nzreddyz@gmail.com

Contact phone number: 021 222 7233

Postal address:
41A Millen Avenue
Pakuranga
Auckland 2010

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:

I would like to submit my objection which is proposed at 520 and 522 Great South Road, Papakura. This development will affect my newly proposed driveway and the median strip which was approved by the Auckland transport for 541 Great south Road which is opposite to 520 Great south roads.

11.1

The new development at 520 Great south road directly affects our entry point of the site. The waiting queue to get in their development will obstruct the traffic movement getting into our site. This will create an unsafe traffic movement for our site.

Property address: 520 and 522 Great south Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The proposed plan change at 520 and 522 will affect my driveway.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: The new development will affect my new proposed drive way and the median strip.

Submission date: 24 September 2020

Supporting documents
112103.PDF

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

#11



Intersection on Great South Road - concept layout

Contact details

Full name of submitter: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Agent's full name:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:

Please see attached submission.

Property address: Please see attached submission.

Map or maps: Please see attached submission.

Other provisions:

Please see attached submission.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Please see attached submission.

12.1 | I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Please see attached submission.

Submission date: 24 September 2020

Supporting documents

HNZPT Submission PPC52 - 520 Great South Road Papakura 24 09 20 FINAL.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



24th September 2020

Attention: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PROPOSED PLAN CHANGE 52 (PRIVATE): 520 GREAT SOUTH ROAD, PAPAURA

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed private change to the Auckland Unitary Plan (Operative in Part) (the proposal):

PC 52 (Private): To rezone the land at 520 Great South Road and the adjoining sites at 522 Great South Road and 21 Gatland Road from Future Urban zone to Mixed Housing Urban.

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

- The absence of any qualified archaeological assessment to verify the potential for adverse effects on any archaeological sites that may exist within the plan change area.

4. Heritage New Zealand's submission is:

- Heritage New Zealand is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.
- Heritage New Zealand seeks that an archaeological assessment is completed by a suitably qualified professional in conjunction with this plan change to establish if any archaeological values are located within the subject sites and assess potential effects on those values.
- The original historic alignment of the Great South Road crosses the subject property. The road follows a series of traditional Maori overland tracks or 'ara' which functioned as an economic supply line and as 'ara wairua' or spiritual pathways, prior to becoming a military supply line in the 19th century during the NZ Land Wars. Further the land also appears to have been used for farming in the 19th century and a structure is visible on the 1942 aerial which may predate 1900. The presence of these features therefore indicate there is potential for archaeology to be present (see attached Appendix A).

- Additionally, while no archaeological sites are currently recorded within the subject sites, the land is located only 400 metres from Slippery Creek which connects to the inlet at Drury, therefore the presence of subsurface sites relating to Maori settlement also cannot be discounted.
- Heritage NZ seeks that the plan change be reviewed following completion of assessment and be modified as appropriate to ensure effects on any archaeological remains are avoided in the first instance.
- This will also enable any pre-1900 features located to be recorded as an archaeological site with the New Zealand Archaeological Association (NZAA) ArchSite database and the Auckland Council Cultural Heritage Index (CHI), and assist owners to plan developments appropriately with regards to avoidance or minimisation of effects, including determining whether an archaeological authority pursuant to the Heritage New Zealand Pouhere Taonga Act (2014) may be required.
- Reliance on the Accidental Discovery Protocol provisions of the Auckland Unitary Plan is only appropriate in the instance where it has been established that the potential for archaeological remains is low.
- Heritage NZ supports the continuation of engagement with iwi as development progresses to facilitate the reinsertion of their footprint within the area. This should include the wider iwi consultation forum engaged during the preceding structure planning processes, to enable their whakaaro to inform future development.

This accords with the following direction provided by the Drury-Opaheke Structure Plan: *'cultural values, the ongoing history and the status of mana whenua need to feature proactively in the design and development of the new urban environment'*, and *'will need to be considered in the preparation of plan changes and other development processes'*.

5. Heritage New Zealand seeks the following decision from the local authority:

- That the plan change not be approved until such time as:
 - 12.2 - an archaeological assessment/field survey has been completed by an appropriately qualified archaeologist, and
 - 12.3 - the plan change is amended as appropriate in response to the assessment to avoid effects on any identified archaeological sites in the first instance.

6. Heritage New Zealand does wish to be heard in support of our submission.

Yours sincerely

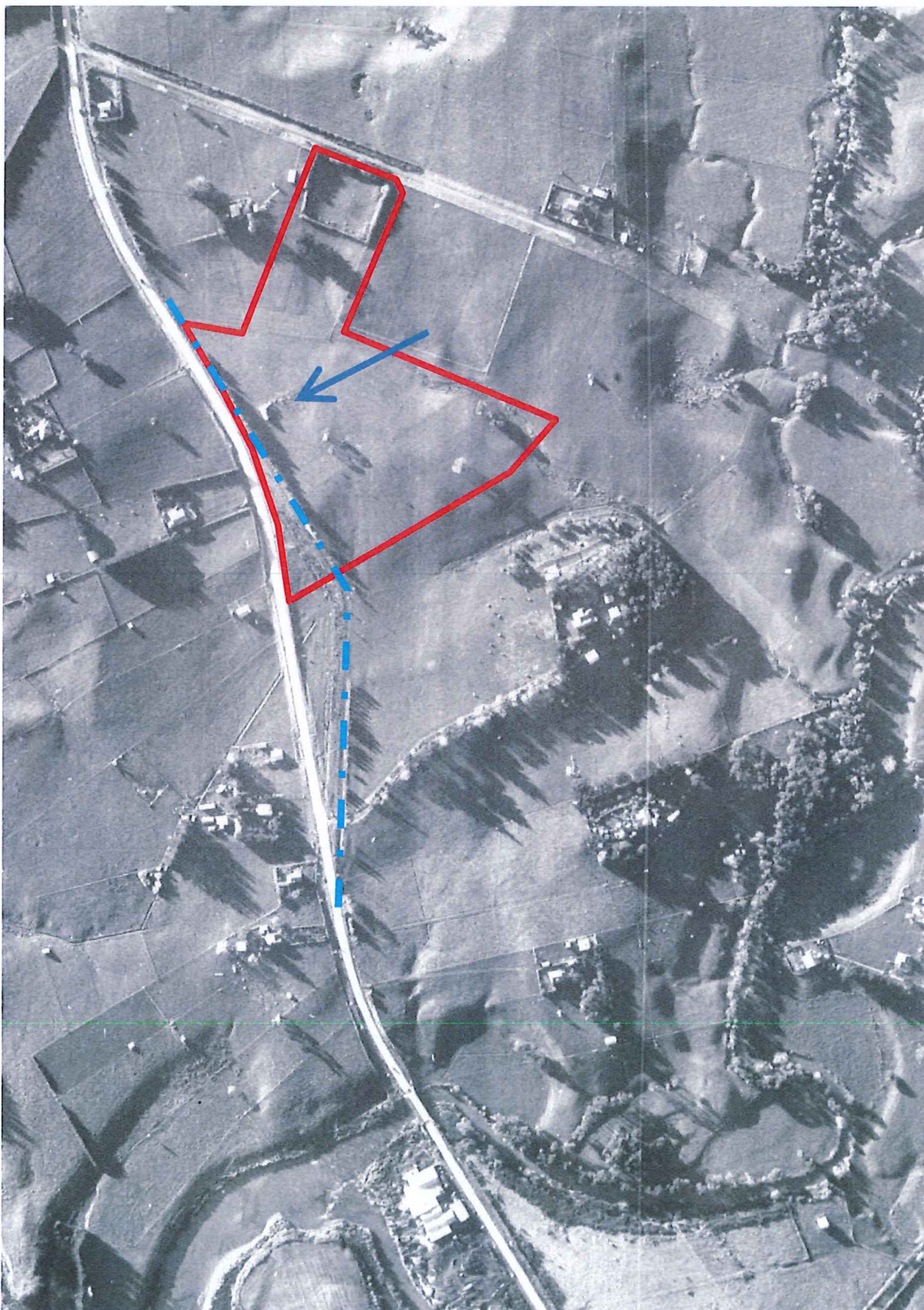


Sherry Reynolds
Director Northern Region

Address for Service:
Susan Andrews
PO Box 105 291, Auckland
09 307 9920
sandrews@heritage.org.nz

Appendix A:

1942 aerial with approximate plan change area outlined in red, structure/shed blue arrow, and former road alignment of Great South Road aqua dashed line.



24 September 2020

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Attn: Sanjay Bangs

Email: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 52 – 520 GREAT SOUTH ROAD, PAPA KURA

Please find attached Auckland Transport's submission on Proposed Private Plan Change 52 from Great South Road Limited and others for land at 520 and 522 Great South Road and 21 Gatland Road Papakura.

If you have any queries in relation to this submission, please contact me at Chris.Freke@at.govt.nz, or on 0274661119.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Freke', written in a cursive style.

Chris Freke
Principal Planner, Strategic Land Use and Spatial Management

cc: Barker and Associates Ltd - rachelm@barker.co.nz

Encl: Auckland Transport's submission on Proposed Private Plan Change 52 – 520 Great South Road, Papakura

Submission by Auckland Transport on Proposed Private Plan Change 52 - 520 Great South Road, Papakura

To: Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Proposed Private Plan Change 52 from 520 Great South Road Limited and others for land at 520 and 522 Great South Road and 21 Gatland Road, Papakura

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction:

- 1.1 520 Great South Road Limited ('the applicant') are applying for a plan change ('PC52' or 'the plan change') to the Auckland Unitary Plan – Operative in Part to rezone approximately 4.63 hectares of land between Great South Road and Gatland Road in Papakura from Future Urban to Residential - Mixed Housing Urban.
- 1.2 According to the documents provided with the plan change application, the rezoning is expected to provide capacity for approximately 113 dwellings.
- 1.3 Auckland Transport is a Council-Controlled Organisation (CCO) of Auckland Council ('the Council') and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.¹ Auckland Transport is responsible for the planning and funding of most public transport; operating the local roading network; and developing and enhancing the local road, public transport, walking and cycling network for the Auckland Region.
- 1.4 Urban development on greenfield land not previously developed for urban purposes generates transport effects and the need for investment in transport infrastructure and services to support construction, land use activities, and the communities that will live and work in these areas. Auckland Transport's submission seeks to ensure that the potential transport related direct and cumulative effects raised by Proposed Private Plan Change 52 are appropriately considered and mitigated.
- 1.5 Auckland Council's Future Urban Land Supply Strategy (2017) sets out the sequencing and timing of future urban land for development readiness over a 30-year period. Although non-statutory, it helps to inform the Council's (and CCO's) infrastructure asset planning and funding priorities and, in turn, enables development capacity to be provided in a coordinated and cost-efficient way via the release of "ready to go" land. This 2017 strategy identifies the plan change area to be development ready in "first half, decade two, 2028-2032". The Auckland Plan

¹ Local Government (Auckland Council) Act 2009, section 39.

2050 (2018) includes this managed expansion into future urban areas as part of Auckland's Development Strategy.

- 1.6 Auckland Transport considers this lack of alignment between the planned staging and "early release" of the subject site as a key consideration in the assessment of effects associated with the proposal and ensuring that these effects are able to be appropriately mitigated. Auckland Transport considers that effects may arise from this development occurring ahead of the provision of the required transport network improvements. In addition, there is significant uncertainty as to whether these effects will be addressed under the general Auckland Unitary Plan provisions that apply to development and subdivision in the proposed zone, noting that the Proposed Plan Change does not include any additional or alternative mechanism / provisions.
- 1.7 Auckland Transport makes this submission to ensure that Proposed Private Plan Change 52 appropriately manages the effects of the proposal on the local and wider transport network.
- 1.8 The specific parts of the plan change that this submission relates to are set out in **Attachment 1**. In keeping with Auckland Transport's purpose, the matters raised relate to transport and transport land use integration, and include:
- A requirement to identify mechanisms to ensure the applicant delivers appropriate upgrades to the adjacent transport network and addresses potential adverse effects from the additional traffic generated from it.
 - A requirement for greater certainty that the proposal will result in a road layout that is integrated with likely future development in the wider area.
- 1.9 Auckland Transport opposes the Proposed Private Plan Change for the reasons outlined in **Attachment 1**, as it does not consider that it contains sufficient provisions or mechanisms to enable the adverse effects arising from the resultant development and subdivision to be appropriately mitigated.
- 1.10 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

2. Decisions sought:

- 2.1 The decisions which Auckland Transport seeks from the Council are set out in **Attachment 1**.
- 2.2 In all cases where amendments to the Proposed Private Plan Change are proposed, Auckland Transport would consider alternative wording, amendments or methods which address the reasons for Auckland Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the decisions requested.

3. Appearance at the hearing

- 3.1 Auckland Transport wishes to be heard in support of this submission.
- 3.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:



Christina Robertson
Group Manager, Strategic Land Use and Spatial Management

Date: 24 September 2020

Contact person: Chris Freke
Principal Planner, Strategic Land Use and Spatial
Management

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 0274 661119

Email: Chris.Freke@at.govt.nz

Attachment 1

Issue / Provision	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
<p>Misalignment of out of sequence release of development site and the provision of transport infrastructure upgrades</p>	<p>Oppose</p>	<p>Auckland Transport is not supportive of development proposals where there is no provision, or there is inadequate provision, for the necessary infrastructure to enable development to be appropriately serviced, such as the upgrading of the surrounding transport network where it will be required.</p> <p>The Supporting Growth Alliance (a partnership of Auckland Transport and Waka Kotahi) has identified Great South Road as a proposed future Frequent Transport Network route requiring bus lanes - this is not expected to be required within the next 10 years and so no work has been undertaken to formally confirm what is needed in this part of the arterial corridor or to prepare any notices of requirement. Auckland Transport does not have funding to provide for any required strategic infrastructure or upgrades to support the development of such out of sequence land.</p> <p>As noted above, the Auckland Plan and the Future Urban Land Supply Strategy identifies this area to be considered for release for urban development in 2028-2032. Auckland Transport is concerned the Proposed Private Plan Change 52 out of sequence development may adversely affect the ability of the future transport network to be upgraded to address the cumulative effects of growth associated with urbanisation of the Future Urban land within Drury-Opaheke. The Proposed Private Plan Change itself does not propose any protection for likely future widening requirements.</p> <p>The Proposed Private Plan Change could also lead to development along Great South Road without associated frontage improvements. These frontage improvements would ideally be provided for at the time of development by the developer in acknowledgement of the mitigation of effects generated by each respective site or area.</p> <p>Great South Road is currently built, in part, to a rural standard with fragmented footpaths on the eastern side along the site frontage. The developer should be required to form the site frontage. Required upgrades would include provision of footpath, kerbs and channels, earthworks to integrate with development levels, cycle facilities, street lights, berm and street trees as well as a portion of carriageway widening, land vesting and stormwater treatment.</p>	<p>That the Proposed Private Plan Change incorporate provisions and / or identifies appropriate mechanisms to provide for the upgrade of Great South Road to urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable a future Frequent Transport Network.</p> <p>These provisions and / or mechanisms should include requirements addressing the following in relation to the upgrade of Great South Road:</p> <ul style="list-style-type: none"> • Vesting and formation of frontage upgrades • Timing of upgrade requirements • Funding and delivery of the above work

13.1

Issue / Provision	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
<p>Integration of the plan change road layout with the existing and anticipated local transport network</p>	<p>Oppose</p>	<p>There are no roading plans proposed as part of the plan change as the changes sought only proposes rezoning the area. As a result, subsequent development of the subject site will occur under the general subdivision provisions of the Auckland Unitary Plan. It is considered that these provisions will not provide sufficient certainty that the effects from development within the plan change area can be mitigated.</p> <p>The Integrated Transport Assessment accompanying the Proposed Private Plan Change identifies the need for a direct road connection from Great South Road, through the plan change area, to ultimately connect with the Park Way Road within the 29 Bellfield Road approved subdivision. The Integrated Transport Assessment indicates that this road will have a cycleway that is separate from the carriageway. The Proposed Private Plan Change makes no provision for this link or specification of the design elements required to be incorporated within it.</p>	<p>Inclusion within the plan change of a requirement to form a link road with separate cycle facility between Great South Road and Gatland Road which should be readily capable of being extended northward. This should also indicate the alignment of the road.</p>
<p>Alignment of local link road between Great South Road and Gatland Road</p>	<p>Oppose</p>	<p>The proposed alignment of the local road servicing the subject site utilises the current unformed road reserve adjoining the Papakura South cemetery and indicates that this could be continued northward.</p> <p>Auckland Transport supports the need for a local link from Great South Road with separated cycle facilities to ultimately connect with the future Park Way Road.</p> <p>Auckland Transport, however, is concerned about the ability of the proposed alignment to be continued northwards from Gatland Road due to it straddling the boundary of two smaller substantially developed existing properties. A more appropriate alternative alignment is considered to run slightly to the west along the frontage of 46 Gatland Road where Proposed Private Plan Change 52 depicts a secondary local road intersection. This secondary road has the potential to become a 'short cut' for through traffic in the event that roading access to the north is created opposite it.</p>	<p>That a more optimal alignment for the Great South Road to Gatland Road link is included as part of the plan change.</p> <p>In the event that the alignment is not changed, Auckland Transport seeks provisions to ensure the roads and intersections are designed so as not to preclude future access to the north and to avoid any adverse effects from through traffic.</p>
<p>Mechanisms to ensure implementation of required mitigation measures to address effects</p>	<p>Oppose</p>	<p>Auckland Transport's assessment of the Proposed Private Plan Change, including the supporting Integrated Transport Assessment, has identified a number of mitigation measures to address the potential effects on the transport network. These include:</p> <ul style="list-style-type: none"> Proposed new intersection with Great South Road to service the enabled redevelopment Provide some widening along the Great South Road frontage to accommodate a painted flush median and right turn pocket (accessing the subject site) 	<p>That the Proposed Private Plan Change incorporate provisions and mechanisms to provide certainty around the assessment of the local network improvements required to mitigate the effects from development enabled under the plan change.</p> <p>That the Proposed Private Plan Change incorporate provisions</p>

13.2

13.3

13.4

Issue / Provision	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
		<ul style="list-style-type: none"> • Upgrading the frontage of Gatland Road and Great South Road to urban standards (as mentioned above) • Intersection of Gatland Road and the proposed link road (servicing the subject site) to provide for a roundabout • Provision of crossing facilities along Great South Road given the increase in demand from the enabled development for pedestrians and cyclists to cross Great South Road to access schools and bus stops. <p>There is a need to ensure that the provisions enabling the proposed development also provide certainty around the implementation and timing of required mitigation measures.</p>	<p>allowing the staging of subdivision and associated mitigation related works to be a matter for discretion.</p>
<p>General – Plan provision mechanisms to address wider cumulative effects of incremental development</p>	<p>Oppose</p>	<p>Proposed Private Plan Change 52 proposes to rezone Future Urban zoned land without any associated specific transport provisions which are needed to create greater certainty that the potential adverse effects from the development are assessed and mitigated.</p> <p>The incremental rezoning of small areas of Future Urban zone land within the same local transport catchment can also reduce the ability to realise and stage integrated and connected transport networks unless there are appropriate provisions to ensure this.</p>	<p>That the Proposed Private Plan Change incorporate appropriate provisions / rules to address the matters raised within this submission.</p> <p>These provisions could potentially be addressed by inclusion within the Auckland Unitary Plan of a precinct plan and associated provisions and or alternative mechanisms.</p>

13.4

13.5

Contact details

Full name of submitter: David and Sarah Bryant

Organisation name:

Agent's full name:

Email address: davidbryant@outlook.co.nz

Contact phone number: 021624231

Postal address:
555 Great South Road
Rosehill
Papakura 2113

Submission details

This is a submission to:

Plan change number: Plan Change 52 (Private)

Plan change name: PC52 (Private): 520 Great South Road, Papakura

My submission relates to

Rule or rules:

The rezone of 520 and 522 Great South Road and 21 Gatland Road, Papakura from Future Urban to Residential - Mixed Housing Urban.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The main reason for our view is that the property is too far away from amenities to justify the housing density that comes with the Residential – Mixed Housing Urban zone. According to google maps 522 Great South Road (the closest of the properties to Drury) is 1.7km away from Drury Meats, close to the Drury town centre. Google maps references this as a 20 minute walk. This is too far away to be considered a reasonable walking distance. The Auckland Plan 2012 lists 400-800m as the walkable catchment for a local centre, the location of this property is over 2x that distance from the nearest local centre, Drury. Also, directive 10.3 of the aforementioned plan directs that urban intensification is to be focused on areas that have, 'networks that easily connect residents to amenities' and 'good walking access to community facilities.' The location of the property does not meet either of these criteria.

The memorandum from Barker and Associates, dated 22 May 2020, stated, 'There are continuous footpaths on the Western side of Great South Road, that extend between the plan change and Drury Village.' This statement is not correct. The Western footpath does not extend all the way to the

Slippery Creek Bridge. Slippery Creek Bridge has only a single crossing on the Eastern side, so if residents were to use the Western footpath, they would have to cross the busy arterial road twice. There are also no pedestrian crossings between the development site and the bridge, so there is a road safety issue. There is no suitable continuous footpath between the property and the bridge on the Eastern side.

The aforementioned memorandum states, 'there are footpaths that extend between the Plan Change area and the Centre' (in reference to Papakura). Again, this refers to the footpaths on the Western side which would require residents to cross the road.

In addition, the proposed zone of Residential – Mixed Housing Urban is not consistent with recent development in the area which is Residential – Mixed Housing Suburban. The majority of houses are single level with a few two storeys. We are not aware of any three storey houses like that alluded to in section 2.4 of the pc-52-appendix-5-urban-design-assessment document.

We are also concerned about the impact of the proposed road widening on existing residents' properties. There does not appear to be any provision for this to be done with consultation of the property owners, or in a mutually agreed manner.

We strongly urge the Council to decline this plan change.

14.1 | I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

14.2 | Details of amendments: Rezone to Residential - Mixed Housing Suburban, continuous safe
 14.3 | pedestrian access to nearby Town Centre's including pedestrian crossings, suitable consultation with
 14.4 | property owners affected by the proposed road widening.

Submission date: 24 September 2020

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
 Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Submission on a publicly notified proposal for policy statement or plan change or variation

Clause 6 of First Schedule, Resource Management Act 1991

FORM 5

Submission on Proposed Plan Change 52 (Private), 520 Great South Road and 21 Gatland Road, Papakura, Auckland Unitary Plan

Attn: Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

By email: unitaryplan@aucklandcouncil.govt.nz

1. Submitter details

Full Name of Submitter: Wainono Investments Ltd

Address for service of the Submitter: Peter Hall Planning Limited, Suite 13, Level 7, 2 Kitchener Street, Auckland 1010

Email: peter@phplanning.co.nz

Phone: 0274222118

Contact Person: Peter Hall

2. Scope of submission

This is a submission on Proposed Private Plan Change 52 to the Auckland Unitary Plan.

The submission is to the plan change in its entirety, which seeks to rezone 520 and 522 Great South Road and 21 Gatland Road, Papakura from Future Urban to Residential – Mixed Housing Urban.

3. Submission

Wainono Investments Limited owns the land at 21 Gatland Road that is subject to the proposed plan change (legally described as Lot 16 DP 43579). This property is shown in **Figure 1** below.

This submission is filed as a late submission. Wainono Investments Limited was not served notice by the Council advising of the request, despite it being a directly affected landowner within the plan change area. It was not made aware that the plan change had been notified. It is not expected that the late filing of this submission will cause unreasonable delay on the processing of the plan change.

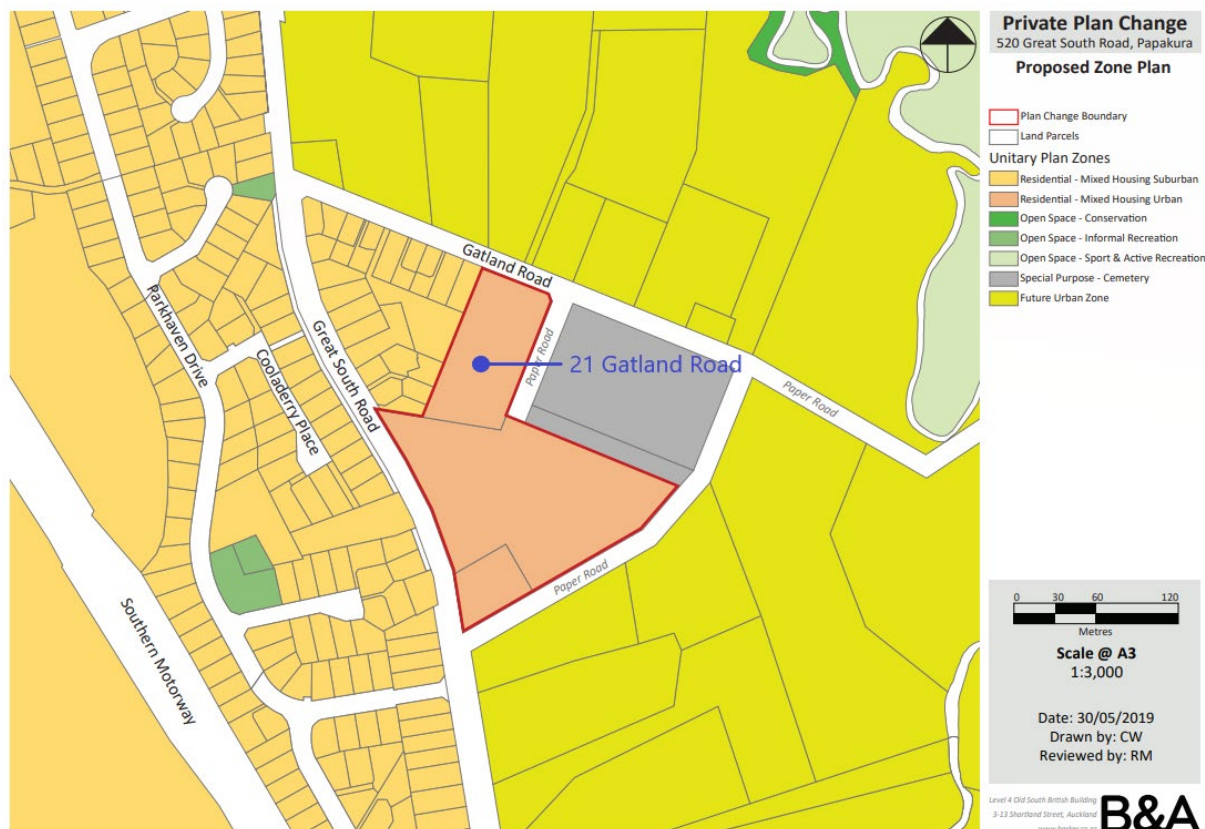


Figure 1: Plan Change Map (Wainono Investments Limited Property at 21 Gatland Road shown)

Wainono Investments Limited **supports** the plan change, including its extent as notified which includes 21 Gatland Road.

This support is subject to the Residential – Mixed Housing Urban being applied and that no further rules or provisions are imposed on 21 Gatland Road or the plan change area more generally, beyond those of the Residential – Mixed Housing Urban and as otherwise currently apply in the Unitary Plan.

Wainono Investments Limited supports the plan change for the following reasons:

- a) The proposed zoning is consistent with Council's Drury-Opāheke Structure Plan.
- b) The Plan Change area is contiguous with the existing urban area and development can be serviced by existing infrastructure, open space and social facilities.
- c) The surrounding road network can operate safely and efficiently with the development enabled by the plan change.
- d) The location is well served by existing formed and paper roads which can be formed to service development.
- e) There are no notable environmental constraints within the Plan Change area that would preclude urban development, or which require any specific rules or overlays to manage, beyond those already provided in the Residential – Mixed Housing Urban or otherwise in the Unitary Plan.
- f) Development of the Plan Change area would not preclude the achievement of quality and integrated outcomes on adjoining Future Urban zoned land.
- g) Technical investigations undertaken by Wainono Investments Limited in support of a resource consent application for residential subdivision on its own land at 21 Gatland Road (including geotech, infrastructure, traffic, and contaminated land), have confirmed its

suitability for urban development. This material has been made available to the plan change applicants.

- h) The Plan Change is the most appropriate way to achieve the purpose of the RMA 1991 and the proposal would give effect to the Regional Policy Statement. It gives effect to the relevant National Policy Statements and the Regional Policy Statement. Adverse effects on the environment are appropriately managed through the proposed Residential – Mixed Housing Urban and other existing provisions of the Unitary Plan. The rezoning supports the integrated management of the use and development of land.

Wainono Investments Limited seeks the following decision by Council:

Accept the Plan Change, including its extent to include 21 Gatland Road. This is subject to the Residential – Mixed Housing Urban being applied and that no further rules or provisions are imposed on 21 Gatland Road or the plan change area more generally, beyond those of the Residential – Mixed Housing Urban and as otherwise currently apply in the Unitary Plan .

Wainono Investments Limited wish to be heard in support of this submission.

If others make a similar submission, Wainono Investments Limited will consider presenting a joint case with them at a hearing.

4. Clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act

Wainono Investments Limited confirms that it could not gain an advantage in trade competition through this submission



.....

Signed for and on behalf of Wainono Investments Limited

3 November 2020

.....

Date

15.1

22 October 2020

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142
Attn: Sanjay Bangs

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Further submission by Auckland Transport on Proposed Private Plan Change 52 – 520 Great South Road, Papakura

Please find attached Auckland Transport's further submission to the submissions lodged on Proposed Private Plan Change 52 from Great South Road Limited and others for land at 520 and 522 Great South Road and 21 Gatland Road, Papakura.

If you have any queries in relation to this further submission, please contact Chris Freke, on 0274661119 or email Chris.Freke@at.govt.nz.

Yours sincerely



Chris Freke
Principal Planner, Strategic Land Use and Spatial Management

cc:
Barkers and Associates Ltd
PO Box 1986
Shortland Street
Auckland 1140

Attention: Rachael Morgan
Via email: rachelm@barker.go.nz

Further Submission by Auckland Transport on Proposed Private Plan Change 52 – 520 Great South Road, Papakura

To: Auckland Council
Private Bag 92300
Auckland 1142

Further submission on: Submissions to Proposed Private Plan Change 52 – 520 Great South Road, Papakura. This plan change is to rezone approximately 4.63 hectares of land between Great South Road and Gatland Road in Papakura from Future Urban to Residential – Mixed Housing Urban.

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 Auckland Transport represents a relevant aspect of the public interest and also has an interest in the proposal that is greater than the interest that the general public has. Auckland Transport's grounds for specifying this are that it is a Council-Controlled Organisation of Auckland Council ('the Council') and Road Controlling Authority for the Auckland region.
- 1.2 Auckland Transport's legislated purpose is "to contribute to an effective, efficient and safe Auckland land transport system in the public interest".

2. Scope of further submission

- 2.1 The specific parts of the submissions supported or opposed, and the reasons for that support or opposition, are set out in **Attachment 1**.
- 2.2 The decisions which Auckland Transport seeks from the Council in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

3. Appearance at the hearing

- 3.1 Auckland Transport wishes to be heard in support of this further submission.

- 3.2 If others make a similar further submission, Auckland Transport will consider presenting a joint case with them at the hearing.



Signed for and on behalf of Auckland Transport

Christina Robertson
Group Manager: Strategic Land Use and Spatial Management

22 October 2020

Address for service of further submitter:

Chris Freke, Principal Planner
Strategic Land Use and Spatial Management
Auckland Transport
20 Viaduct Harbour Avenue
Auckland Central
Auckland 1010

Email: Chris.Freke@at.govt.nz

Attachment 1:

Submission point	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
11.1	Sriini Reddy nzreddyz@gmail.com	Concern that the proposal will interfere with their consented entry point, driveway, and median strip (on Great South Road) opposite the plan change area at 541 Great South Road.	Support in part	<p>The submitter has a granted resource consent (LUC60328810) to establish an aged care facility with associated vehicle access, including median, at a location on the opposite side of Great South Road, Papakura to the proposed new intersection.</p> <p>Auckland Transport is supportive in part of submission point 11.1. Further analysis and investigation should be undertaken by the applicant as a part of this plan change process into the suitability of the location and/or design of the proposed intersection with Great South Road, Papakura. If the plan change is to be approved, the plan change should be amended, as required, to reflect the outcome of this analysis and investigation.</p>	Allow

Contact details

Full name of person making a further submission: Judith Coleman

Organisation name:

Full name of your agent:

Email address: totaras117@gmail.com

Contact phone number: 092943005

Postal address:

P.O. Box 19

Drury

Auckland 2247

Submission details

This is a further submission to:

Plan change number: Plan Change 52

Plan change name: PC 52 (Private): 520 Great South Road, Papakura

Original submission details

Original submitters name and address:

Judith Coleman

Submission number: unknown

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:

Point number Opposing the Plan Change

The reasons for my or our support or opposition are:

To Whom It May Concern

Re: The Summary of Submissions on proposed Plan Change 52 (Private)

520 Great South Road, Papakura

We support all the submissions which oppose the plan change.

It is evident that there is no compelling reason this plan change should be adopted. There are many valid reasons it should be opposed and a lot more work needs to be done on the whole area from Coulthard Terrace to Slippery Creek Bridge before any development takes place here.

The area from Coulthard Terrace to Slippery Creek Bridge should be looked at for development in the future (as planned by the Unitary Plan in 2028). This will enable time for excellent planning for the community, consultation with the Iwi and enable infrastructure to be developed in advance for the whole area.

Yours sincerely

Judith Coleman

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 22 October 2020

Attend a hearing

I or we wish to be heard in support of this submission: Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission? No

Declaration

What is your interest in the proposal? I am the person representing a relevant aspect of the public interest

Specify upon which grounds you come within this category:
submitting on behalf of Judith Coleman

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

To Whom It May Concern

Re: The Summary of Submissions on proposed Plan Change 52 (Private)

520 Great South Road, Papakura

We support all the submissions which oppose the plan change.

It is evident that there is no compelling reason this plan change should be adopted. There are many valid reasons it should be opposed and a lot more work needs to be done on the whole area from Coulthard Terrace to Slippery Creek Bridge before any development takes place here.

The area from Coulthard Terrace to Slippery Creek Bridge should be looked at for development in the future (as planned by the Unitary Plan in 2028). This will enable time for excellent planning for the community, consultation with the Iwi and enable infrastructure to be developed in advance for the whole area.

Yours sincerely

Judith Coleman

Tena koe

Please accept this further submission in support of Ngati Te Ata submission [attached]

Ngati Tamaoho especially supports the lack of opportunity for meaningful engagement and input into design that represents the values of Mana Whenua

Nga mihi
Lucie



NGĀTI TAMAHO TRUST

Lucille Rutherford

RMA Technical Officer

Ph:09 930 7823 Mob:0211708543

E: rmaofficer@tamaoho.maori.nz

128 Hingaia Road, Karaka,

PO Box 2721652, Papakura

Auckland 2244

www.tamaoho.maori.nz

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NGĀTI TE ATA

“Ka whiti te ra ki tua o rehua ka ara a Kaiwhare i te rua”

23rd September 2020

AUCKLAND UNITARY PLAN: SUBMISSION ON PLAN CHANGE 52 (PRIVATE) 520 GREAT SOUTH ROAD, PAPAURA

To: Auckland Council

Auckland Council
Unitary Plan
Private Bag 92300
Auckland 1142

Attention: Planning Technician

Name of Submitter: Ngāti Te Ata (the **Submitter**)

INTRODUCTION

1. This is a submission on proposed Plan Change 52 (Private): 520 Great South Road, Papakura. Proposed Private Plan Change 52 seeks to rezone 520 and 522 Great South Road and 21 Gatland Road, Papakura from Future Urban to Residential – Mixed Housing Urban
2. The Submitter could not gain an advantage in trade competition through this submission.
3. This submission relates to the entire Application; however, the Submitter is particularly interested in iwi consultation, engagement and consideration of the Submitter’s cultural preferences arising from PPC52.
4. The Submitter opposes the Application on the basis that sections 6(e), 6(f), 7(a) and 8 of the Resource Management Act 1991 (**RMA**) have not been adequately met, and on the basis that the Submitters were not adequately consulted on the Application.

BACKGROUND

5. Ngati Te Ata are one of the main mana whenua groups in the Papakura-Drury area. Within the wider landscape of Tamaki Makaurau (Auckland) lay the settlements of the Te Waiohua people (the original inhabitants). Members of the Tainui waka settled around the isthmus and began to intermarry with the ancestors of Te Waiohua. It was this intermarriage and the development of other bonds between the people that settlement established in Papakura-Drury. Ngati Te Ata descend from both groups. As the descendants (current generation) Ngati Te Ata are kaitiaki and have inherent responsibilities to ensure that they can protect and preserve their taonga for future generations.

REASONS FOR SUBMISSION

6. The Submitter considers that the Application is inconsistent with Part 2 of the RMA, specifically:
 - (a) Section 6(e) which states that the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers is to be protected from inappropriate subdivision, use and development;
 - (b) Section 6(f) which states that historic heritage is to be protected from inappropriate subdivision, use and development;
 - (c) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga;
 - (d) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
7. Of specific concern to the Submitters is the lack any real iwi consultation engagement, or consideration of the Submitter's cultural preferences when developing the plan change. Consultation would have enabled the Submitter to contribute to the development of the plan change and assist the Applicant to ensure that it gave appropriate effect to Part 2 of the RMA and Mana Whenua design principles.
8. Established Treaty principles emphasise tribal rangatiratanga, the active protection of Maori people in the use of their lands, waters and other taonga, and the duty to consult with Maori.
9. Partnership requires a duty to interact in good faith and in the nature of a partnership. There should be a sense of shared enterprise and mutual benefit where each partner must take account of the needs and interests of the other.
10. Redress is the obligation to remedy past breaches of the Treaty. Redress is necessary to restore the honour and integrity of the Treaty partner, and the mana and status of Māori, as part of the reconciliation process. The provision of redress must also take account of its practical impact and the need to avoid the creation of fresh injustice. While the obligation of redress sits with the Crown and Auckland Council (through Council), which has a role in the implementation of redress at the

regional and local level, the applicant also has a role in a more collaborative approach with iwi in a mutually beneficial negotiated way in light of PPC52. This, however, has not occurred.

11. Examples of how the Applicant could have successfully engaged with the Submitters include:
 - (a) Initiating a comprehensive engagement process with Ngati Te Ata who wished to engage in the plan change process, including **undertaking a cultural values-impact assessment report**. Ngati Te Ata as mana whenua have the ability to work collaboratively with the Applicant; and
 - (b) Incorporating Te Aranga Design Principles and other key design themes and principles into the design and layout of the proposed plan change; and
 - (c) Incorporating Mana Whenua principles into fresh water solutions on the site, including riparian reserves and public access open space in stormwater management areas.

DECISION SOUGHT

12. The Submitter seeks the following decision from Auckland Council:
 - (a) Reject the Application on the basis that there has been a lack of iwi consultation, engagement and consideration of the Submitter's cultural preferences resulting in a failure to give effect to sections 6(e), 6(f), 7(a) and 8 of the RMA.
13. The Submitter wishes to be heard in support of its submission.
14. The Submitter would consider presenting a joint case if others make similar submissions.

23rd September 2020



Karl Flavell
On behalf of Ngāti Te Ata
Electronic address for service of submitter: karl_flavell@hotmail.com
Telephone: 0279328998
Postal address: Po Box 437, Pukekohe 2340.

**Further Submission on a publicly notified proposal for policy
statement or plan change or variation**

Clause 8 of First Schedule, Resource Management Act 1991

FORM 6

**Further Submission on Proposed Plan Change 52 (Private), 520
Great South Road and 21 Gatland Road, Papakura, Auckland
Unitary Plan**

Attn: Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

By email: unitaryplan@aucklandcouncil.govt.nz

1. Further Submitter details

Full Name of Further Submitter: Wainono Investments Ltd

Address for service of the Submitter: Peter Hall Planning Limited, Suite 13, Level 7, 2 Kitchener
Street, Auckland 1010

Email: peter@phplanning.co.nz

Phone: 0274222118

Contact Person: Peter Hall

2. Scope of further submission

Wainono Investments Limited has lodged a late submission on Proposed Plan Change 52 to the Auckland Unitary Plan.

Wainono Investments Limited has an interest in the proposal that is greater than the interest the general public has. It owns the land at 21 Gatland Road, Papakura, that is subject to the proposed plan change (legally described as Lot 16 DP 43579). The late filing of this further submission will not cause unreasonable delay and is necessary to ensure the public participation interests of the further submitter as the owner of land subject to the plan change.

3. Further Submission

Wainono Investments Limited **oppose** the submissions as set out in the table at **Attachment 1** to this further submission for the reasons set out.

This submission is filed as a late submission. Wainono Investments Limited was not served notice by the Council advising of the request, despite it being a directly affected landowner within the plan change area. It was not made aware that the plan change had been notified.

Wainono Investments Limited seek the whole or part of these submissions be allowed and disallowed as set out in the table at Attachment 1.

Wainono Investments Limited wish to be heard in support of its further submission.

If others make a similar submission, Wainono Investments Limited will consider presenting a joint case with them at a hearing.



.....

Signed for and on behalf of Wainono Investments Limited

3 November 2020

.....

Date

Attachment 1

Name and address of original submitter	Submission Number	Submission Point	The particular parts of the submission supported or opposed are:	Support/Oppose with reasons	I seek the submission be allowed or disallowed
<p>Veolia Water Services Attn: Sanjeev Morar</p>	<p>10</p>	<p>10.1-10.5</p>	<p>The relief sought by the submitter that:</p> <ol style="list-style-type: none"> 1. That infrastructure makes provision for future capacity (10.1). 2. That ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met (10.2) 3. That the existing water infrastructure is modelled to ensure sufficient capacity the wastewater disposal from the Plan Change Area is required to be connected to the public wastewater network, discharging to the Slippery Creek Wastewater Pump Station, Motorway Wastewater Pump Station and across State Highway 1 to the Hingaia Wastewater Pump Station (10.3) 4. That the Applicant will, at its cost, design and construct any wastewater infrastructure and 	<p>Oppose While these are all valid points made by Veolia Water Services for consideration at subdivision consent stage, they do not require the addition of any new rules or provisions in the Plan Change to secure. The Unitary Plan and the RMA 1991 have sufficient safeguards at subdivision in respect of the matters raised by Veolia Water Services. The technical investigations undertaken by both the plan change applicant and Wainono Investments Limited, confirm that there are no fundamental water/wastewater supply issues that would preclude zoning of the land as sought.</p>	<p>Disallowed</p>

Name and address of original submitter	Submission Number	Submission Point	The particular parts of the submission supported or opposed are:	Support/Oppose with reasons	I seek the submission be allowed or disallowed
Heritage New Zealand Pouhere Taonga Attn: Susan Andrews	12	12.3	<p>any water infrastructure required (10.4).</p> <p>5. That the Applicant obtains approval from Veolia for the connection points to the local network to service the Plan Change Area (10.5).</p> <p>Seeks that the plan change not be approved until such time as the plan change is amended as appropriate in response to the assessment to avoid effects on any identified archaeological sites in the first instance.</p>	<p>Oppose</p> <p>The Auckland Unitary Plan does not identify any sites of archaeological significance over the plan change area. The Heritage New Zealand Pouhere Taonga Act 2014 provides sufficient protection for the protection of archaeological material as yet undiscovered on the property. No new provisions need to be added to the Plan Change area beyond those already in the Unitary Plan and Heritage New Zealand Pouhere Taonga Act 2014.</p>	Disallowed

Name and address of original submitter	Submission Number	Submission Point	The particular parts of the submission supported or opposed are:	Support/Oppose with reasons	I seek the submission be allowed or disallowed
Auckland Transport Attn: Chris Freke	13	13.1	That the Proposed Private Plan Change incorporate provisions and / or identifies appropriate mechanisms to provide for the upgrade of Great South Road to urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable a future Frequent Transport Network. These provisions and / or mechanisms should include requirements addressing the following in relation to the upgrade of Great South Road: - Vesting and formation of frontage upgrades - Timing of upgrade requirements - Funding and delivery of the above work	The requirement sought to upgrade Great South Road puts too much obligation on the plan change land owners when the upgrade of Great South Road has much wider benefits beyond the plan change area. Importantly, there is nothing in the plan change that will adversely affect the ability for Auckland Transport to undertake any necessary upgrades to enable a future Frequent Transport Network. The Unitary Plan and the RMA 1991 have sufficient safeguards at subdivision in respect of these matters raised by Auckland Transport. In any event, the development of the property at 21 Gatland Road owned by Wainono Investments Limited will not have any adverse impact on Great South Road or its future upgrade, and should not be subject to such requirements.	Disallowed
Auckland Transport Attn: Chris Freke	13	13.2	Inclusion within the plan change of a requirement to form a link road with separate cycle facility between Great	Wainono Investments Limited strongly opposes the imposition of indicative roading or similar on the plan change land. A link road	Disallowed

Name and address of original submitter	Submission Number	Submission Point	The particular parts of the submission supported or opposed are:	Support/Oppose with reasons	I seek the submission be allowed or disallowed
Auckland Transport Attn: Chris Freke	13	13.3	South Road and Gatland Road which should be readily capable of being extended northward. This should also indicate the alignment of the road	(paper road) already exists between Gatland Road and the balance of the plan change land, making this the logical alignment here. Road layout for the balance of the plan change area is best left to subdivision design stage when it is done in conjunction with wider subdivision design and is not appropriate or necessary for the plan change.	
Auckland Transport Attn: Chris Freke	13	13.4	That a more optimal alignment for the Great South Road to Gatland Road link is included as part of the plan change. In the event that the alignment is not changed, Auckland Transport seeks provisions to ensure the roads and intersections are designed so as not to preclude future access to the north and to avoid any adverse effects from through traffic.	Wainono Investments Limited opposes the imposition of indicative roading or similar on the plan change land. A link road (paper road) already exists between Gatland Road and the balance of the plan change land, making this the logical alignment here. Road layout for the balance of the plan change area is best left to subdivision design stage when it is done in conjunction with wider subdivision design and is not appropriate or necessary for the plan change.	Disallowed
Auckland Transport Attn: Chris Freke	13	13.4	That the Proposed Private Plan Change incorporate provisions and mechanisms to provide certainty around the	No additional provisions mechanisms to provide certainty around the assessment of the local	Disallowed

Name and address of original submitter	Submission Number	Submission Point	The particular parts of the submission supported or opposed are:	Support/Oppose with reasons	I seek the submission be allowed or disallowed
Auckland Transport Attn: Chris Freke	13	13.5	<p>assessment of the local network improvements required to mitigate the effects from development enabled under the plan change.</p> <p>That the Proposed Private Plan Change incorporate provisions allowing the staging of subdivision and associated mitigation related works to be a matter for discretion.</p>	<p>network improvements required to mitigate the effects from development are required beyond those which already exist in the Unitary Plan. In any event, the development of the property at 21 Gatland Road should be exempt from any such requirements given it can be developed independently and will not be of such a scale or intensity as to trigger such requirements.</p>	
			<p>That the Proposed Private Plan Change incorporate appropriate provisions / rules to address the matters raised within this submission.</p> <p>These provisions could potentially be addressed by inclusion within the Auckland Unitary Plan of a precinct plan and associated provisions and or alternative mechanisms.</p>	<p>Wainono Investments Limited opposes the imposition of a precinct plan (or similar such mechanisms) as sought by Auckland Transport on the grounds that the Unitary Plan and the RMA 1991 have sufficient safeguards and protections already at subdivision stage in respect to the matters raised, and in any event they are not required in respect to the further submitter's property at 21 Gatland Road. This property can be developed independently and will not be of such a scale or intensity as to trigger the need for such provisions.</p>	Disallowed

Plan Change 52 (Private) - 520 Great South Road

Summary of Decisions Requested

Sub Number	Sub#/Point	Submitter Name	Contact details	Summary of decision requested	FS	FS name	Support or Oppose
1	1.1	Tingran	tingran.duan@gmail.com	Approve the plan change without any amendments.			
2	2.1	Casey Norris	cnorris@ljhtakanini.co.nz	Decline the plan change as it will directly effect the submitters property outlook, value, sun light, drainage and traffic management.	FS02	Judith Coleman	Support
3	3.1	Jamie Barry Mackenzie	jamie.mackenzie@live.com	Decline the plan change.	FS02	Judith Coleman	Support
4	4.1	Chris Caldwell	ccaldwell@xtra.co.nz	Approve the plan change with the amendments requested by the submitter.			
4	4.2	Chris Caldwell	ccaldwell@xtra.co.nz	Upgrade the safety provisions for the proposed intersection.			
5	5.1	Judy and Peter Coleman M & J Coleman	totaras117@gmail.com	Seeks that the entire area should be looked at as a whole as this would be better for the environment and would allow better planning for its community as per comments in submission.			
5	5.2	Judy and Peter Coleman M & J Coleman	totaras117@gmail.com	Oppose the parcel of land being rezoned Mixed Housing Urban.	FS02	Judith Coleman	Support
6	6.1	Priyanka Hulikoppe	skadole@yahoo.com	Decline the plan change.	FS02	Judith Coleman	Support
6	6.2	Priyanka Hulikoppe	skadole@yahoo.com	Seeks that the whole area be developed together and considered together rather than rezoning small patches.			
6	6.3	Priyanka Hulikoppe	skadole@yahoo.com	Seeks that there be some open space (gaps) between urban and suburban zones.			
7	7.1	Julia Marr	julia@jmarrphysio.co.nz	Approve the plan change with the amendments.			
7	7.2	Julia Marr	julia@jmarrphysio.co.nz	Seeks for less dwellings to allow for community space within this new development and more parking.			
8	8.1	Ngati Te Ata Attn: Karl Flavell	karl_flavell@hotmail.com	Reject the Application on the basis that there has been a lack of iwi consultation, engagement and consideration of the Submitter's cultural preferences resulting in a failure to give effect to sections 6(e), 6(f), 7(a) and 8 of the RMA.	FS02	Judith Coleman	Support
8	8.1	Ngati Te Ata Attn: Karl Flavell	karl_flavell@hotmail.com	Reject the Application on the basis that there has been a lack of iwi consultation, engagement and consideration of the Submitter's cultural preferences resulting in a failure to give effect to sections 6(e), 6(f), 7(a) and 8 of the RMA.	FS03	Ngati Tamaoho	Support
9	9.1	Lee & Gary Running	sales@atlas movers.co.nz	If the proposed plan change is not declined, than it be amended as outlined below.			

Plan Change 52 (Private) - 520 Great South Road

Summary of Decisions Requested

Sub Number	Sub#/Point	Submitter Name	Contact details	Summary of decision requested	FS	FS name	Support or Oppose
9	9.2	Lee & Gary Running	sales@atlas movers.co.nz	Seeks that when infrastructure planning is being done/considered for 520 Great South Road and 21 Gatland Road, that there be consideration for future capacity and access to a storm water connections at 9 & 11 Gatland Road to be connected to.			
10	10.1	Veolia Water Services Attn: Sanjeev Morar	sanjeev.morar@veolia.com	Seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
10	10.2	Veolia Water Services Attn: Sanjeev Morar	sanjeev.morar@veolia.com	Seeks that the existing water infrastructure is modelled to ensure sufficient capacity. Should there be insufficient capacity, it is the responsibility of the Applicant to, at its cost, design and construct required network infrastructure upgrades.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
10	10.3	Veolia Water Services Attn: Sanjeev Morar	sanjeev.morar@veolia.com	Seeks that the wastewater disposal from the Plan Change Area is required to be connected to the public wastewater network, discharging to the Slippery Creek Wastewater Pump Station, Motorway Wastewater Pump Station and across State Highway 1 to the Hingaia Wastewater Pump Station.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
10	10.4	Veolia Water Services Attn: Sanjeev Morar	sanjeev.morar@veolia.com	Seeks that the Applicant will, at its cost, design and construct: i. any wastewater infrastructure required to enable the connection of the Plan Change Area to the public wastewater disposal and collection system ii. any water infrastructure required to enable the connection of the Plan Change Area to the public retail water network.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
10	10.5	Veolia Water Services Attn: Sanjeev Morar	sanjeev.morar@veolia.com	Seeks that the Applicant obtains approval from Veolia for the connection points to the local network to service the Plan Change Area.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
11	11.1	Srini Reddy	nzreddyz@gmail.com	Objects to PC 52 as this development will affect the submitter's newly proposed drive way and the median strip which was approved by the Auckland Transport for 541 Great South Road, which is opposite to 520 Great South Road.	FS01	Auckland Transport Attn: Chris Freke	Support in part
12	12.1	Heritage New Zealand Pouhere Taonga Attn: Susan Andrews	sandrews@heritage.org.nz	Approve the plan change with the amendments requested.			
12	12.2	Heritage New Zealand Pouhere Taonga Attn: Susan Andrews	sandrews@heritage.org.nz	Seeks that the plan change not be approved until such time as an archaeological assessment/field survey has been completed by an appropriately qualified archaeologist.	FS02	Judith Coleman	Support

Plan Change 52 (Private) - 520 Great South Road

Summary of Decisions Requested

Sub Number	Sub#/Point	Submitter Name	Contact details	Summary of decision requested	FS	FS name	Support or Oppose
12	12.3	Heritage New Zealand Pouhere Taonga Attn: Susan Andrews	sandrews@heritage.org.nz	Seeks that the plan change not be approved until such time as the plan change is amended as appropriate in response to the assessment to avoid effects on any identified archaeological sites in the first instance.	FS02	Judith Coleman	Support
12	12.3	Heritage New Zealand Pouhere Taonga Attn: Susan Andrews	sandrews@heritage.org.nz	Seeks that the plan change not be approved until such time as the plan change is amended as appropriate in response to the assessment to avoid effects on any identified archaeological sites in the first instance.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
13	13.1	Auckland Transport Attn: Chris Freke	Chris.Freke@at.govt.nz; rachelm@barker.co.nz	That the Proposed Private Plan Change incorporate provisions and / or identifies appropriate mechanisms to provide for the upgrade of Great South Road to urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable a future Frequent Transport Network. These provisions and / or mechanisms should include requirements addressing the following in relation to the upgrade of Great South Road: - Vesting and formation of frontage upgrades - Timing of upgrade requirements - Funding and delivery of the above work	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
13	13.2	Auckland Transport Attn: Chris Freke	Chris.Freke@at.govt.nz; rachelm@barker.co.nz	Inclusion within the plan change of a requirement to form a link road with separate cycle facility between Great South Road and Gatland Road which should be readily capable of being extended northward. This should also indicate the alignment of the road.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
13	13.3	Auckland Transport Attn: Chris Freke	Chris.Freke@at.govt.nz; rachelm@barker.co.nz	That a more optimal alignment for the Great South Road to Gatland Road link is included as part of the plan change. In the event that the alignment is not changed, Auckland Transport seeks provisions to ensure the roads and intersections are designed so as not to preclude future access to the north and to avoid any adverse effects from through traffic.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
13	13.4	Auckland Transport Attn: Chris Freke	Chris.Freke@at.govt.nz; rachelm@barker.co.nz	That the Proposed Private Plan Change incorporate provisions and mechanisms to provide certainty around the assessment of the local network improvements required to mitigate the effects from development enabled under the plan change. That the Proposed Private Plan Change incorporate provisions allowing the staging of subdivision and associated mitigation related works to be a matter for discretion.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes

Plan Change 52 (Private) - 520 Great South Road

Summary of Decisions Requested

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13	13.5	Auckland Transport Attn: Chris Freke	Chris.Freke@at.govt.nz; rachelm@barker.co.nz	That the Proposed Private Plan Change incorporate appropriate provisions / rules to address the matters raised within this submission. These provisions could potentially be addressed by inclusion within the Auckland Unitary Plan of a precinct plan and associated provisions and or alternative mechanisms.	FS04	Wainono Investments Ltd Attn: Peter Hall	Opposes
14	14.1	David and Sarah Bryant	davidbryant@outlook.co.nz	Decline the plan change, but if approved, make the amendments requested by the submitter	FS02	Judith Coleman	Support
14	14.2	David and Sarah Bryant	davidbryant@outlook.co.nz	Rezone to Residential - Mixed Housing Suburban			
14	14.3	David and Sarah Bryant	davidbryant@outlook.co.nz	Establish continuous safe pedestrian access to nearby Town Centre's including pedestrian crossings.			
14	14.4	David and Sarah Bryant	davidbryant@outlook.co.nz	Undertake suitable consultation with property owners affected by the proposed road widening.			
15	15.1	Wainono Investments Ltd Attn: Peter Hall	peter@phplanning.co.nz	Seeks to accept the Plan Change, including its extent to include 21 Gatland Road. This is subject to the Residential – Mixed Housing Urban being applied and that no further rules or provisions are imposed on 21 Gatland Road or the plan change area more generally, beyond those of the Residential – Mixed Housing Urban and as otherwise currently apply in the Unitary Plan.			

APPENDIX 3
LOCAL BOARD VIEWS

CARRIED

15 Local Board views on Plan Change 52 (Private) 520 Great South Road, Papakura

Resolution number PPK/2021/31

MOVED by Member F Auva'a, seconded by Member G Hawkins:

That the Papakura Local Board:

- a) **provide the following local board views on private plan change 52 by 520 GSR Limited to rezone 4.63ha of land from Future Urban Zone to Residential – Mixed Urban Zone at 520 Great South Road, 522 Great South Road and 21 Gatland Road, Papakura:**

Council ability to provide infrastructure for development

- i) **The local board believe the land should be released for development in line with Auckland Council's Future Urban Land Supply Strategy to ensure council can manage the costs associated with the development of infrastructure to support growth. The local board has an advocacy point in the Local Board Plan 2020 regarding infrastructure to be in place before development happens.**

Wider view of development in the immediate area

- ii) **The Local Board Plan 2020 contains a number of advocacy points pertaining to planning for good community outcomes as intensification occurs, including the following points:**
- **The provision of greenspace within or nearby intensive developments**
 - **A reduction in the threshold criteria for walking distances to local parks or reserves**
 - **Provision of onsite parking**
 - **Provision of visitor on street parking**
 - **Road widths that allow access for public transport, utility and emergency vehicles**
 - **Provision of shared pedestrian / cycleways.**
- iii) **A holistic approach is needed in line with the Opāheke Structure Plan.**
- iv) **This is an intensive green fields development that will change the amenity of the immediate area.**

Green Space / Play Space

- v) **This will be an intensive development with minimal outside play area for the children within the residential sites. It is likely many children will live in this development.**
- vi) **Although Opāheke Reserve is reasonably close as the "crow flies", crossing Slippery Creek is a significant barrier to access, meaning people would have to travel 4-5kms to access that park.**

- vii) Ensure there is close by green space where children have an area to kick a ball around and utilize play equipment.
- viii) The local board has an expectation that the developer would provide reserve area that includes multi-generational opportunities such as adult fitness equipment or exercise stations as well as play equipment as it is not close to any other facilities. This reflects the Local Board Plan 2020 advocacy point relating to developers funding the development of playgrounds in line with council standards.
- ix) The traffic on Great South Road is a significant safety barrier to accessing the Park Haven Reserve.
- x) Ensure there is a green space for a community garden that has room for a shed for storage of community tools.
- xi) The board does not consider the Gatland Road Cemetery to be an open space for recreation purposes.
- xii) The board has received advice that the tree canopy in Papakura is sitting below the region's average at 13 per cent. The Local Board Plan 2020 details an initiative supporting the Urban Ngahere programme (increasing the tree coverage and creating vegetation corridors for native bird flight paths). The board would like to see significant planting of trees to support this initiative within this development.

Connectivity

- xiii) Plan for accessibility to Opāheke Reserve.
- xiv) Connectivity to the Bellfield development should be taken into consideration, including the provision of shared pedestrian / cycleways.

Parking and road widths

- xv) The board has concerns about the lack of off-street parking in new developments in general. The design of a development needs to allow for onsite parking for each lot to minimize cars that will be parking on the berms as there is nowhere else to park.
- xvi) The nearest supermarket is in Papakura, therefore is it logical to expect that each housing unit in the proposed development will have a minimum of two cars.
- xvii) A minimum of two onsite parking spaces for every unit should be a requirement in the consent conditions.
- xviii) On street visitor parking should also be made available and be a required in the consenting process.
- xix) The board has fielded complaints from other subdivisions in relation to narrow road widths and the inability for emergency and service vehicles to access. There are already issues within the Addison development with narrow roads not being wide enough for emergency vehicles or rubbish trucks to enter. The Police have also approached the board about this issue.

- xx) Please ensure input on this development is sought from the fire, ambulance and police services. The services have complained to the board in the past about the narrow widths of new subdivision roads.
- xxi) The board supports the submitters' requests for traffic treatments relating to the development. Great South Road is a busy road. This development will add to the traffic volumes. The right hand turn on to Great South Road from the "new road" and the Gatland Road intersections will be dangerous. It will also be dangerous to turn right into the "new road" and Gatland Road. The "new road" or the Gatland Road intersection may need some sort of treatment to slow the Great South Road traffic to make it safer for traffic to turn right.
- xxii) Traffic calming measures should be required as part of the "new road" development to slow traffic down as it could become a "rat run" from Gatland Road to Great South Road going south.
- xxiii) Consideration should also be given to the impact of the work about to begin on the third lane on the State Highway One Motorway from Papakura to Drury as traffic will be diverted on to Great South Road to allow work to continue on the motorway.

Presumption that people will use public transport

- xxiv) While current thinking is everyone should be using public transport (PT), the reality is that the PT option does not work for everyone. PT does not necessarily run near where the people need it to go or within the timeframes people need it. Even if they can take public transport to work, they still need to have vehicles for the weekly shopping accessing medical services and visiting friends or relatives.

Public transport

- xxv) Public transport options need to be available nearby so people can get to where they need to go. The public transport services need to adequately cater to the population including the elderly, ie: a kneeling bus.

Mana whenua input

- xxvi) Consultation with mana whenua is a requirement under the Act. It is concerning that the Section 32 report advises that iwi were consulted yet there is a submission from Ngāti Te Ata requesting the plan changes be declined on the basis of no iwi consultation.
- xxvii) The board encourages consultation with mana whenua and implementing recommendations proposed into the design of the development.

Stormwater

- xxviii) The board recommend appropriate stormwater treatments in line with the latest three waters legislation requirements. Although this is a small development in terms of the wider scale proposed for the area. All efforts should be made to retain and treat stormwater to ensure the optimum to the receiving environment.
- xxix) Rain harvesting and the recycling of stormwater should be a

requirement given the latest drought in Tāmaki Makaurau.

- b) appoint the Local Board Chairperson and Deputy Chairperson to speak to the local board views at a hearing on private plan change 52
- c) delegate authority to the chairperson of Papakura Local Board to make a replacement appointment in the event the local board member appointed in resolution b) is unable to attend the private plan change hearing
- d) acknowledge Local Board Services staff Lee Manaia, Local Board Advisor, and Victoria Hutt, Senior Local Board Advisor for their assistance in the drafting of the board's feedback.

CARRIED

16 Papakura Local Board Grants Programme 2021/2022

Resolution number PPK/2021/32

MOVED by Member S Smurthwaite, seconded by Deputy Chairperson J Robinson:

That the Papakura Local Board:

- a) adopt the Papakura Grants Programme 2021/2022 in Attachment A to the report "Papakura Local Board Grants Programme 2021/2022"
- b) request officers to investigate and advise whether the gap between closing the round and decision making can be reduced for the four grants round.

CARRIED

17 2021 Local Government New Zealand Conference and Annual General Meeting

Resolution number PPK/2021/33

MOVED by Member F Auva'a, seconded by Member G Hawkins:

That the Papakura Local Board:

- a) note the budget constraints in the current financial year and the recommended process for the appointment of attendees and delegates to the Local Government New Zealand 2021 Conference and Annual General Meeting in Blenheim from 15 to 17 July 2021
- b) endorse the selection of one local board representative per cluster through the Local Board Chairs' Forum and nominate Member Jan Robinson as a candidate for the southern cluster representative for consideration by the local board chairs forum at their April 2021 meeting
- c) note the process to submit remits to the Annual General Meeting and entries for the 2021 Local Government New Zealand Excellence Awards has been communicated to elected members on 2 March 2021
- d) confirm that conference attendance including travel and accommodation will be paid for in accordance with the current Auckland Council Elected Member Expense Policy
- e) note that all local board members who are appointed to attend the conference will be confirmed to the General Manager Local Board Services by 15 April 2021 at the latest to ensure that they are registered with Local Government New Zealand

APPENDIX 4

CLAUSE 23 REQUEST AND RESPONSES

6 April 2020

Ms Rachel Morgan

Issued via email: rachelm@barker.co.nz

Dear Rachel,

RE: Clause 23 RMA Further Information – 520 Great South Road Private Plan Change Request

Further to your private plan change request under Clause 21 to Schedule 1 of the Resource Management Act 1991 in relation to 520 Great South Road from 520 Great South Road Ltd, Council has now completed an assessment of the information supplied.

Pursuant to Clause 23 of the Resource Management Act 1991 (please see Appendix 1), Council requires further information to continue processing the private plan change request.

The table in Appendix 2 attached to this letter sets out the nature of the further information required and reasons for its request. It also includes non-Clause 23 advisory notes as labelled.

Should you wish to discuss this matter or seek a meeting to clarify points in this letter please do not hesitate to contact me.

Kind regards,



Sanjay Bangs
Planner
Plans & Places Department
021 619 327

Appendix 1

Basis for the Information Sought

First Schedule to the Resource Management Act 1991

Clause 23 Further information may be required

(1) Where a local authority receives a request from any person under [clause 21](#), it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

- (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of [Schedule 4](#); or
- (b) the ways in which any adverse effects may be mitigated; or
- (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
- (d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

(2) A local authority, within 15 working days of receiving any information under this clause, may require additional information relating to the request.

(3) A local authority may, within 20 working days of receiving a request under [clause 21](#), or, if further or additional information is sought under subclause (1) or subclause (2), within 15 working days of receiving that information, commission a report in relation to the request and shall notify the person who made the request that such a report has been commissioned.

(4) A local authority must specify in writing its reasons for requiring further or additional information or for commissioning a report under this clause.

(5) The person who made the request—

- (a) may decline, in writing, to provide the further or additional information or to agree to the commissioning of a report; and
- (b) may require the local authority to proceed with considering the request.

(6) To avoid doubt, if the person who made the request declines under subclause (5) to provide the further or additional information, the local authority may at any time reject the request or decide not to approve the plan change requested, if it considers that it has insufficient information to enable it to consider or approve the request.

Appendix 2:

Further information requested under Clause 23 First Schedule of the Resource Management Act 1991

Contents

Planning, statutory and general matters – Sanjay Bangs, Plans & Places 1

Transport matters – Mat Collins, Flow Transportation Specialists Ltd 4

Development engineering matters – Arun Niravath, Regulatory Engineering South 6

Stormwater and flooding matters – Chloe Trenouth, Healthy Waters Consultant..... 6

Geotechnical matters – Shane Lander, Lander Geotechnical Consultants Limited 10

Note: No further information has been requested by:

- Sarah Lindsay, Auckland Design Office

#	Category of information	Specific Request	Reasons for request
Planning, statutory and general matters – Sanjay Bangs, Plans & Places			
P1	Section 32 assessment	Please expand on the section 32 analysis contained in Section 9.0 of the Section 32 Assessment to outline the costs and benefits of the identified options at a finer grain level.	The section 32 analysis provided does not contain a sufficient depth of information to understand why the proposed rezoning is the most appropriate option. As per section 32(1)(c) RMA, such an assessment should contain a level of detail that corresponds to the scale and significance of effects anticipated. Section 32(2) requires an assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the

#	Category of information	Specific Request	Reasons for request
P2	Consultation	Please expand on the consultation undertaken with iwi groups outlined in Section 6.3 of the Section 32 Assessment report, including the timeframes, scope of engagement and documents provided to iwi groups (including all iwi groups with an interest in the land).	<p>provisions. Further explanation is required to understand the benefits and costs of each option in relation to the anticipated effects of the rezoning, particularly in relation to transport, stormwater/flooding and urban design.</p> <p>Further clarification is required to understand the nature of the consultation undertaken, in terms of timeframes, scope and documents supplied to mana whenua in Section 6.3 of the Section 32 Assessment report. This should include all iwi groups with a potential interest in the land, as outlined the Auckland Council's mana whenua contacts facility: https://www.aucklandcouncil.govt.nz/building-and-consents/understanding-building-consents-process/prepare-application/prepare-resource-consent-application/Pages/find-hapu-iwi-contacts-for-your-area.aspx</p>
P3	Urban design	Please provide further comment on the quality of access from the site to convenience retail and commercial services.	<p>Section 8.2 of the Section 32 Assessment notes the following:</p> <p><i>In relation to social facilities, the Plan Change area is within approximately 1.5km of the existing Drury Centre and 3km of the Papakura Metropolitan Centre. Both are accessible by bus services on Great South Road. The closest local shop is located approximately 200m to the south of the Plan Change area, although the site is not zoned as a Neighbourhood Centre. Given this, the local day-to-day needs of residents would be met within walking distance of the Plan Change area. Larger commercial and community facilities would be available within a short bus ride or moderate walking distance.</i></p> <p>Further information is sought as to the type of neighbourhood shop located within walking distance and the retail and commercial services present at the Papakura and Drury centres. The availability of these amenities is important to understand the local day-to-day needs of residents would be met within walking distance of the Plan Change</p>

#	Category of information	Specific Request	Reasons for request
			<p>area, particularly if the build-out of this PPC land occurs well-ahead of the development of the future Drury East centre.</p> <p>Commentary on the quality of pedestrian and cycling facilities and frequency of public transport is also sought to understand whether these will be genuine travel choices for future residents.</p>
P4	Future Urban Land Supply Strategy (FULSS)	Please expand on the assessment of the PPC against the FULSS in Section 6.2.2 of the Section 32 Assessment report to consider the matters set out in Appendix 1 and 2 of the FULSS ,	<p>Appendix 1 of the FULSS outlines the high level reasoning underpinning the staging and sequencing set out in the FULSS. Appendix 2 identifies the specific considerations for each geographic location within Future Urban areas.</p> <p>Further assessment against these specific considerations is sought to better understand how the PPC aligns with the FULSS and the Auckland Plan 2050.</p>
P5	Regional Policy Statement (RPS) Assessment	Please expand on the RPS Assessment provided as Appendix 4 to the request to clarify how the PPC is consistent with the identified RPS matters.	<p>Further clarification is sought in relation to the following RPS provisions:</p> <ul style="list-style-type: none"> • B2.2.2(5) and B2.4.2(2) which seeks to enable residential intensification close to centres, public transport, social facilities and employment opportunities; • B2.3.2 in relation to achieving the built form outcomes sought, particularly whether any precinct provisions are required to achieve these outcomes (also expressed in B2.4.2(8) relating to whether place-based planning tools are appropriate); • B7.3 in terms of whether a Stormwater Management Area – Flow Control is necessary to achieve hydrological mitigations outlined in the Stormwater Assessment (refer to Item HW4).

Transport matters – Mat Collins, Flow Transportation Specialists Ltd

T1	Access visibility	Please provide further information on measures that could be put in place to address restricted visibility. The assessment should also address the additional volume of traffic likely to use the new road as an alternative.	The Transport Assessment (TA) states that visibility from Gatland Road/Great South Road intersection towards the south is restricted but concludes that increased use of this intersection will have minimal effect on the safety. An increase in traffic movements through this intersection will increase the likelihood of a crash occurring and, with a speed limit of 70 km/hr on Great South Road, the consequences of any crash are likely to be serious. Measures to eliminate the visibility shortfall, such as speed treatments, removal of sightline obstructions such as vegetation which sits within the road reserve should be considered.
T2	Pedestrian network	Please confirm how pedestrian connectivity between the existing network and the development site will be provided.	<p>Drury School is located approximately 1km south of the subject site (about a 13-minute walk) and is considered a reasonable walking distance. The Drury School website also indicates that the Site is within their walking school bus route. Both Rosehill College and Rosehill Intermediate are located to the north of the site, on the opposite side of Great South Road.</p> <p>Further, there are existing bus stops on either side of Great South Road. Pedestrian demand can be expected to be generated, however the PPC does not confirm how this will be provided for.</p> <p>Can commentary please be provided on the existing pedestrian network, including any improvements considered necessary to ensure safe connections exist for those generated by the PPC.</p>
T3	Great South Road improvements	Please confirm the how mitigation measures for Great South Road will be delivered – relating to both Great South Road/Gatland Road sightline improvements and the new intersection.	<p>Section 8.3 of the Section 32 report states that “TPC also assume that widening of Great South Road outside of the Plan Change area will occur to provide for a dedicated right turn pocket into the Plan Change area. The detailed design and location of this would be determined through a future resource consent process under E27 Transport.</p>

T4	Great South Road improvements	Please confirm if the proposed road widening on Great South Road, including compliant berm formation, can be accommodated within the current road boundary and what setbacks are proposed to accommodate the required infrastructure, noting that the road reserve width adjacent to the site narrows relative to the upstream and downstream width.	<p><i>We note that this approach for assessment was accepted by Council and Auckland Transport as part of Plan Change 8 to the AUP (Kings College)."</i></p> <p>The mitigation measures suggested by the applicant seem acceptable, however it is unclear how the delivery of the measures are secured through a future resource consent(s). It could be that once zoned, access relies on Gatland Road only, and the new access is not delivered. Council could then be faced with a situation where individual consents are sought, each of which are considered permitted, that cumulatively trigger the need for mitigation identified within the TA but cannot be required under the Auckland-wide rules of the AUP (i.e. if E27.6.1. Trip Generation is not triggered). This is particularly relevant for those measures that are not immediately adjacent to the property boundary.</p> <p>The delivery of the mitigation anticipated in the ITA, particularly that not adjacent to the development needs to be secured through a sound framework which ensures a safe and efficient outcome for all users, Auckland Transport and Auckland Council. At this time, a risk exists in relation to the best outcome when considering the effects of the PPC and how identified effects are mitigated.</p>
T5	Traffic generation	Please clarify the distribution of the predicted traffic volumes at both Gatland Road and the new road intersections.	<p>Section 3.3 in the TA states that <i>"The new flows have been distributed at the intersections in the same proportions as the existing turning movements recorded at the Great South Road/Gatland Road intersection."</i> However, different turning volumes are calculated in some of the scenarios. For example, Figure 9 in the TA assumes a 50/50 in/out split at the new road during the midday period, but the same proportion split has not been applied at Gatland Road intersection. Although they could be minor differences, clarification of the assumed split from the applicant is requested.</p>
T6	Future Road Connection	Please comment on how the PPC aligns with AUP objectives for urban growth and urban subdivision in relation to the future	<p>In order to ensure connectivity between potential future urban areas, the transport network within the PPC should allow for future extension. Connectivity of the transport network reduces the reliance on private vehicle transport, increases accessibility,</p>

		extension of the public road network to the FUZ land to the south.	permeability and increases resilience. Connectivity is supported by the following AUP policies and objectives <ul style="list-style-type: none"> • Policy B2.3.2(1) • Policy B3.3.2(2) • Policy E38.3(10) • Objective B3.3.1.(1)
Development engineering matters – Arun Niravath, Regulatory Engineering South			
Advice notes (non-Clause 23)			
DE1	Wastewater capacity	<p>Veolia Water have been consulted and have advised the following:</p> <p><i>“At present, there is insufficient capacity to service the proposed development. Upgrades to the downstream gravity wastewater network as well as pump station and storage will be required. Water network upgrades may also be required.”</i></p> <p>As cited above, there is insufficient capacity in the wastewater network to service the proposed area and there may be some upgrades required in the water supply reticulation. At the future subdivision or land use resource consent stage, necessary upgrades to the infrastructure network will be required in consultation with Veolia Water.</p>	
Stormwater and flooding matters – Chloe Trenouth, Healthy Waters Consultant			
HW1	Stormwater Management Plan (SMP)	<p>Please provide a Stormwater Management Plan to support the plan change.</p> <p><u>Note:</u> It is recommended that a meeting between the applicant and Healthy Waters be arranged to discuss the requirements of the SMP.</p>	<p>The plan change land is in the Future Urban zone and seeks to apply live zonings. An assessment of effects and proposed mitigations should be included in a SMP as part of the AEE and Section 32 Assessment to demonstrate how the Regional Policy Statement and regional plan provisions in Chapter E1 will be met, in particular policies E.1.3(3), E1.3(8) and E1.3(10).</p> <p>The SMP should:</p>

HW2	Network Discharge Consent (NDC)	Please confirm whether it is intended that the plan change come under the Council's Global NDC for stormwater discharges.	<ul style="list-style-type: none"> • address the Drury-Opapeke SMP and also discuss downstream effects; and • Assess why the proposed stormwater treatment and flood mitigation is the Best Practicable Option. <p>It is unclear from the plan change documents whether it is intended for the stormwater discharges from the site to come under the Council's global NDC. This should be clearly identified in the SMP. The Stormwater Assessment supplied does not constitute a SMP in accordance with the Council's NDC.</p> <p>A clear statement on the methods that are intended to be used to meet Schedule 4 NDC performance requirements is needed in the SMP and these should be tied to the proposed land use.</p> <p>It is recommended that a meeting between the applicant and Healthy Waters be arranged to discuss what is required to come under the NDC.</p>
HW3	Precinct	Please explain why precinct provisions have not been proposed to achieve the outcomes of the proposed stormwater management approach.	<p>Section 8 of the stormwater assessment identifies options, including use of inert building materials, green outfalls, and quality treatment of all roads. These are not currently requirements of the AUP and therefore would not be implemented without precinct provisions.</p> <p>Further discussions regarding appropriate precinct provisions will be required once an SMP is provided.</p>
HW4	SMAF Control	Please confirm whether Stormwater Management Area (SMAF) - Flow Control is to apply to the site.	<p>The stormwater assessment appears to require hydrological mitigation but it is unclear whether the plan change proposes to apply the SMAF Control to the site.</p> <p>Further assessment of the erosion risks should be undertaken to understand whether the SMAF Control will adequately mitigate potential effects. Additional mitigation may be required. The SMP should identify whether this is the best practicable option.</p>

HW5	Stormwater Modelling	<p>Please provide further information is on the modelling to be included within the SMP including:</p> <ul style="list-style-type: none"> • more description on the modelling undertaken to support the development, in particular where there are discrepancies between the Council model and the TP108 graphical assessment. • demonstrate that the Council Rapid Model is suitable for undertaking the assessment of impacts from a specific site. • confirmation that Tonkin & Taylor have not amended the HW model as part of this work. • provide clarification of the MPD imperviousness used for the rural areas. 	<p><u>Advice note (non-Clause 23): If hydrological mitigation is proposed then it is recommended that the SMAF Control be applied to the land through this PPC.</u></p> <p>Modelling information is required to understand the effects of the plan change in terms of increased stormwater runoff, peak flows and effects on the flood plain both upstream and downstream.</p> <p>It appears that the HW model has been used to assess flows within the watercourse through 520 Great South Road and TP108 graphical has been used to assess the local discharge from 520 Great South Road. However, there does not appear to be any commentary around how the development would impact the catchment flows. Even if this is negligible then this should still be worked through.</p> <p>Section 5.2 states that ‘...rural areas increases by 20% compared to the ED scenario...’ Is this correct, or has the rural imperviousness increased to 20%? This clarification is required to confirm the model that is being used and the accuracy of flow volumes assumed through the site.</p>
HW6	New asset ownership	<p>Please provide discussion on the future ownership of the proposed stormwater devices.</p>	<p>It is unclear whether the proposed stormwater management approach will result public assets to be vested in Healthy Waters, or whether they would remain private assets The vesting of stormwater devices in Healthy Waters has implications for the design of these assets and future maintenance costs for Council.</p>

HW7	Proposed stormwater management	Please clarify the proposed stormwater management principles that have been adopted and explain what stormwater management is considered to be the Best Practicable Option.	It is unclear what the actual principles for this development are. Greater discussion needs to be provided in relation to what could be considered and why the proposed stormwater management is considered to be the Best Practicable Option. Swales are mentioned as being possible (Section 8.1 and 8.2); however, it is then proposed to convey runoff in a new pipe network (Section 8.3).
HW8	SMP	Please provide a location plan of the plan change area to demonstrate how it fits in with the local Slippery Creek catchment.	Section 2.1 of the Stormwater Assessment discusses the catchment. However, it does not consider the site location in the context of the wider catchment. The site is located upstream of a very large floodplain associated with flows from the urban Papakura catchment. It is important to understand the effects of the plan change on the wider catchment.
HW9	SMP	Please address the impact of the embankment approximately 60m upstream of the south eastern property boundary.	It is unclear from Section 2.4 of the Stormwater Assessment what the impact of the identified embankment would have on the environment. Does it create ponding water above the embankment, or does it impact the floodplain? This issue needs to be identified in order to determine the extent of effects and potential mitigation required.
HW10	SMP	Please include further discussion about the receiving environment identified as a Significant Ecological Area (SEA) and implications to stormwater management because it is identified as a SEA.	Section 2.5 of the Stormwater Assessment discusses the receiving environment but does not identify the importance of it as a Significant Ecological Area. This is a relevant consideration in terms of effects on the environment and in determining the Best Practicable Option for stormwater management, particularly quality.
HW11	SMP	Please clarify the extent of impervious coverage anticipated by the plan change.	Section 3 of the Stormwater Assessment identifies that the impervious coverage will increase, with greater runoff volumes and higher flows. However, the document is confusing with regard to what area it actually covers. This needs to be clarified.

HW12	SMP	Clarify that Table 5.2 identifies 100-year ARI peak flow levels rather than flood levels.	Table 5.2 indicates flood levels but they are not necessarily flood levels. This appears to be an error.
HW13	SMP	Confirm whether the 24hour rainfall depth was used for the TP108 graphical assessment.	Section 6.2.1 discusses the assumption for runoff. Although HW assumes that the 24hr rainfall depths was used this is not explicitly identified in the document.
HW14	Flooding	Clarify how it is proposed to manage discharges from each sub-catchment when flows will be passed forward into a floodplain.	Discharges to the south currently enter a floodplain area across 530 GSR. Will unattenuated flows increase the extent, depth or frequency of this flooding? Will it be affected by the Slippery Creek Catchment. Further information is required to determine the proposal not to require attenuation is the Best Practicable Option.
HW15	Flooding	Confirm how Subcatchment B will work in relation to passing forward flows. This would need to rely on overland flow paths because there no pipe network	Section 6.1.3 discusses the proposal to pass forward flows without attenuation. Depending on what development area you consider, No. 522 GSR could be significantly affected with flows passed to the property every time there is rainfall. Insufficient information is provided to understand the downstream effects of passing flows forward without attenuation.
Geotechnical matters – Shane Lander, Lander Geotechnical Consultants Limited			
G1	Land modifications	Please assess the geotechnical constraints that may arise within the watercourse in the eastern corner of the site, and provide recommendations on further site investigations required.	Historic aerial photos infer fills or land modifications may have occurred within the watercourse in the eastern corner of the site. It is recommended that ENGEO re-affirm their interpretation of land modifications on the site. Depending on the outcome, please clarify (in terms of Section 6.3.4) that if filling is likely to be present in the watercourse, whether there are any perceived geotechnical constraints or concerns. If there are concerns, ENGEO should also make

			recommendations on what (if any) site investigations will be required to address this (for example, during a Resource Consent phase).
G2	Watercourse	Please provide comment on perceived geotechnical constraints if the low lying watercourse area was to be filled, and clarify what further site investigations will likely be required to assess these (for example, during a Resource Consent phase). This should also consider the point raised in G1 above	No investigations have been undertaken in the invert of the low-lying shallow watercourse feature (as per Section 5.1 of the ENGeo report). As stated in Section 3 of the ENGeo report, it is "...proposed to ease the steeper contours and fill the lower lying areas...". Further clarification is sought on the perceived geotechnical constraints in this area and further site investigations required at the resource consents stage.
G3	21 Gatland Road	Please clarify the nature of future site investigations for 21 Gatland Road.	Number 21 Gatland Road is included in the plan change submission, but this block of land has not been investigated as part of the ENGeo geotechnical report, however future investigations are recommended here.
G4	Seismicity	Please provide comment on likely seismic site class and also the proximity of the site to any active faults.	The liquefaction potential reported in Section 6.5 of the ENGeo report is low based on the regional setting and hand auger borehole findings. In addition, NZS1170.5 seismic site class and seismicity have not been commented on in the ENGeo report.
G5	Liquefaction	Please clarify whether more detailed liquefaction analyses of a deeper soil profile will be a necessary requirement for further assessment (e.g. during a Resource Consent stage).	Further comment is sought on likely seismic site class (e.g. based on their regional knowledge) and also the proximity of the site to any active faults. Also, please clarify whether more detailed liquefaction analyses of a deeper soil profile will be a necessary requirement for further assessment (e.g. during a Resource Consent stage).

MEMORANDUM



Urban & Environmental

To: Auckland Council: Sanjay Bangs
From: Barker & Associates
Date: 22 May 2020
Re: 520 Great South Road: Planning RFI Response

520 Great South Road Plan Change Request

We write in response to your request dated 6 April 2020 for further information under Clause 23(1) to Schedule 1 of the Resource Management Act 1991 relating to the above private plan change request. This letter sets out our responses to the matters raised in your letter, and is supported by the following attachment prepared by the technical specialists supporting the plan change request:

- Attachment 1: 520 Great South Road Section 32 Assessment Report
- Attachment 2: Response to Transport Request for Further Information
- Attachment 3: Stormwater Management Plan
- Attachment 4: Response to Geotech Request for Further Information
- Attachment 5: Letter confirming wastewater network solution

The requests and our responses are set out below.

1.0 PLANNING

RFI	Request	Response
P1	Please expand on the section 32 analysis contained in Section 9.0 of the Section 32 Assessment to outline the costs and benefits of the identified options at a finer grain level.	Refer to additional section 32 analysis within Section 9.0 of the Section 32 Assessment Report.
P2	Please expand on the consultation undertaken with iwi groups outlined in Section 6.3 of the Section 32 Assessment report, including the timeframes, scope of engagement and documents provided to iwi groups (including all iwi groups with an interest in the land).	Refer to Section 6.3 of the Section 32 Assessment Report.
P3	Further information is sought as to the type of neighbourhood shop located within walking distance and the retail and commercial services present at the Papakura and Drury centres. The availability of these amenities is important to understand the local day-	The closet shop to the Plan Change area is located on 530 Great South Road approximately 150m to the south of the Plan Change area. This shop sells fruit and vegetables.

	<p>to-day needs of residents would be met within walking distance of the Plan Change area, particularly if the build-out of this PPC land occurs well-ahead of the development of the future Drury East centre.</p> <p>Commentary on the quality of pedestrian and cycling facilities and frequency of public transport is also sought to understand whether these will be genuine travel choices for future residents.</p> <p>Please provide further comment on the quality of access from the site to convenience retail and commercial services.</p>	<p>From the Plan Change area it is 1.5km to the Drury village. There are continuous footpaths on the western side of Great South Road that extend between the Plan Change area and Drury Village. The topography is relatively flat so therefore it is a gentle and manageable walk. The Drury Village has all the required day to day needs There is a foodmarket, butcher, bakery, hairdresser, beauty salon, real estate agent, petrol station and car workshop to name a few of the businesses located at Drury Village.</p> <p>Papakura is located 3km north of the Plan Change area. Whilst Papakura is located further away there are footpaths that extend between the Plan Change area and the Centre and the topography is relatively flat. Papakura is a larger centre with a wide range of retail, commercial, civic and other amenities.</p> <p>Both centres can also be accessed via established public transport. The primary mode of public transport serving the site is the 376 bus route with two sets of bus stops located within 400m on Great South Road. The 376 is a local service that runs between Drury and Papakura running at half hourly frequencies at peak times, down to hourly outside of the peaks. The Drury Central Train Station is due to be complete in 2024 and it is anticipated that bus services along Great South Road will increase to become a Frequent Transport Network. This is indicated in the Supporting Growth Alliance’s preferred network for the South: https://www.supportinggrowth.govt.nz/assets/2019-Launch-Website/c1c1831b2e/Indicative-Network-2019-Maps-South.pdf. To support this, as part of their resource consent application, the Plan Change Applicant is proposing a 5m setback from Great South Road to enable any necessary future road widening. Discussions with Auckland Transport on this matter are on-going as part of the resource consent process.</p>
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		<p>There is presently no cycling infrastructure connecting the Plan Change area to the closest shop or local centres. Plans for the introduction of dedicated cycling facilities (the Papakura to Drury Cycle Lane) along Great South Road in this location have been on hold since 2012. We expect that this would be provided as part of a future upgrade to Great South Road as noted above.</p> <p>It is noted that the Drury-Opaheke Structure Plan includes a Neighbourhood Centre zoning on the corner of Great South Road and Gatland Road, however, as noted above there are sufficient commercial and social facilities in close proximity to the site that can be accessed by active and public modes of transport.</p>
P4	Please expand on the assessment of the PPC against the FULSS in Section 6.2.2 of the Section 32 Assessment report to consider the matters set out in Appendix 1 and 2 of the FULSS.	Refer to Appendix 10 to the Section 32 Assessment Report.
P5	Please expand on the RPS Assessment provided as Appendix 4 to the request to clarify how the PPC is consistent with the identified RPS matters.	Refer to Appendix 4 of the Section 32 Assessment Report.
DE1	<p>Veolia Water have been consulted and have advised the following:</p> <p><i>“At present, there is insufficient capacity to service the proposed development. Upgrades to the downstream gravity wastewater network as well as pump station and storage will be required. Water network upgrades may also be required.”</i></p> <p>As cited above, there is insufficient capacity in the wastewater network to service the proposed area and there may be some upgrades required in the water supply reticulation. At the future subdivision or land use resource consent stage, necessary upgrades to the infrastructure network will be</p>	<p>Maven Engineering Consultants are providing engineering advice as part of the resource consent application currently being prepared to redevelop the site.</p> <p>Maven advise that a pump station can be provided on-site that would not pump during peak times either from the current existing catchment or from the proposed development. This on-site solution will take pressure off the existing downstream pump stations during peak times. This solution is currently being discussed with Veolia.</p>

MEMORANDUM



Urban & Environmental

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	required in consultation with Veolia Water.	
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14 May 2020

Rachel Morgan
Senior Planner
Barker Associates
By Email: rachelm@barker.co.nz

Dear Rachel,

520 GREAT SOUTH ROAD, DRURY - REQUEST FOR FURTHER INFORMATION – TRANSPORT

Further to the request for additional information received from Auckland Council dated 6 April 2020. I can provide the following additional information on points raised by Council. For ease of reference, Council's transport-related requests have been repeated below with the same numbering.

T1 Please provide further information on measures that could be put in place to address restricted visibility. The assessment should also address the additional volume of traffic likely to use the new road as an alternative.

TPC Response

I agree the recommended measures, namely reduced speed limits and removal of vegetation to improve sight lines can address safety at the intersection. However, I considered that the removal of the vegetation will be enough to address given the likely flows added to the intersection will be minor.

Both these measures are outside of the control of the applicant and are the responsibility of the road controlling authority, Auckland Transport.

We understand the applicant is happy to work with Auckland Transport on the removal of the vegetation. Furthermore, I understand that Auckland Transport is reducing the current speed limit from 70km/h to 50km/h which will take effect in June 2020.

With regards to an assessment of additional traffic using the new road, we understand Council's Traffic Engineer is referring to the new road through 520 Great South Road that will connect with Great South Road. If connected through to Gatland Road, there is the potential of traffic generated from other land use on Gatland Road to use the new road.

Auckland Office:
P O Box 60-255, Titirangi, Auckland 0642
Level 1, 400 Titirangi Road, Titirangi Village
Tel: (09) 817 2500
Fax: (09) 817 2504
www.trafficplanning.co.nz

Traffic modelling results provided in our traffic assessment show that there is spare capacity within intersection once the plan change area is fully developed. All movements at the intersection are operating at a Level of Service (LOS) "A" except for the right turn movement from the new road during the AM and PM periods which is operating at a LOS C.

Any additional vehicle movements using the intersection and not relating to 520 Great South Road are only expected to do so if their destination or origin is towards the south. Otherwise using Gatland Road, would continue to be the preferred route. This will add turning movements for the left turn from and the right turn into the new road. The modelling indicates that both these movements would operate well under capacity and additional movements would not have an adverse effect on the intersection performance.

T2 Please confirm how pedestrian connectivity between the existing network and the development site will be provided.

TPC Response

We anticipate that any future development of the plan change area will include new roads with a pedestrian network that will connect to Great South Road and a new footpath along Great South Road for the extent of the site frontage will be provided. This is proposed as part of a resource consent application that is now lodged with Council for the development of 520 Great South Road.

Any footpath connection to the south can be provided on the east side of Great South Road where a footpath exists 80 metres south of site. Pedestrians are currently using the unsealed shoulder along this side of the road and as development occurs a more formal footpath can be provided.

A footpath connection to the north is available on the west side of Great South Road and we anticipate a pedestrian crossing facility being established immediately north of the new intersection with Great South Road as the site is developed, and this is proposed in the resource consent application for 520 Great South Road. This will also provide a connection to the bus stops either side of Great South Road.

T3 Please confirm the how mitigation measures for Great South Road will be delivered – relating to both Great South Road/Gatland Road sightline improvements and the new intersection.

TPC Response

An application is about to be lodged for the development of 520 Great South Road that is consistent with the proposed private plan change. A new intersection with Great South Road, a right turn pocket and a pedestrian crossing facility are proposed. An indicative layout of these features is included in **Figure 1** below. Final details of the design will need to be addressed with Auckland Transport however this should provide enough confidence that these mitigations can be accommodated and are proposed as part of development on the site.

With regards to the Great South Road / Gatland Road intersection. The mitigation measures have been discussed in response to T1.

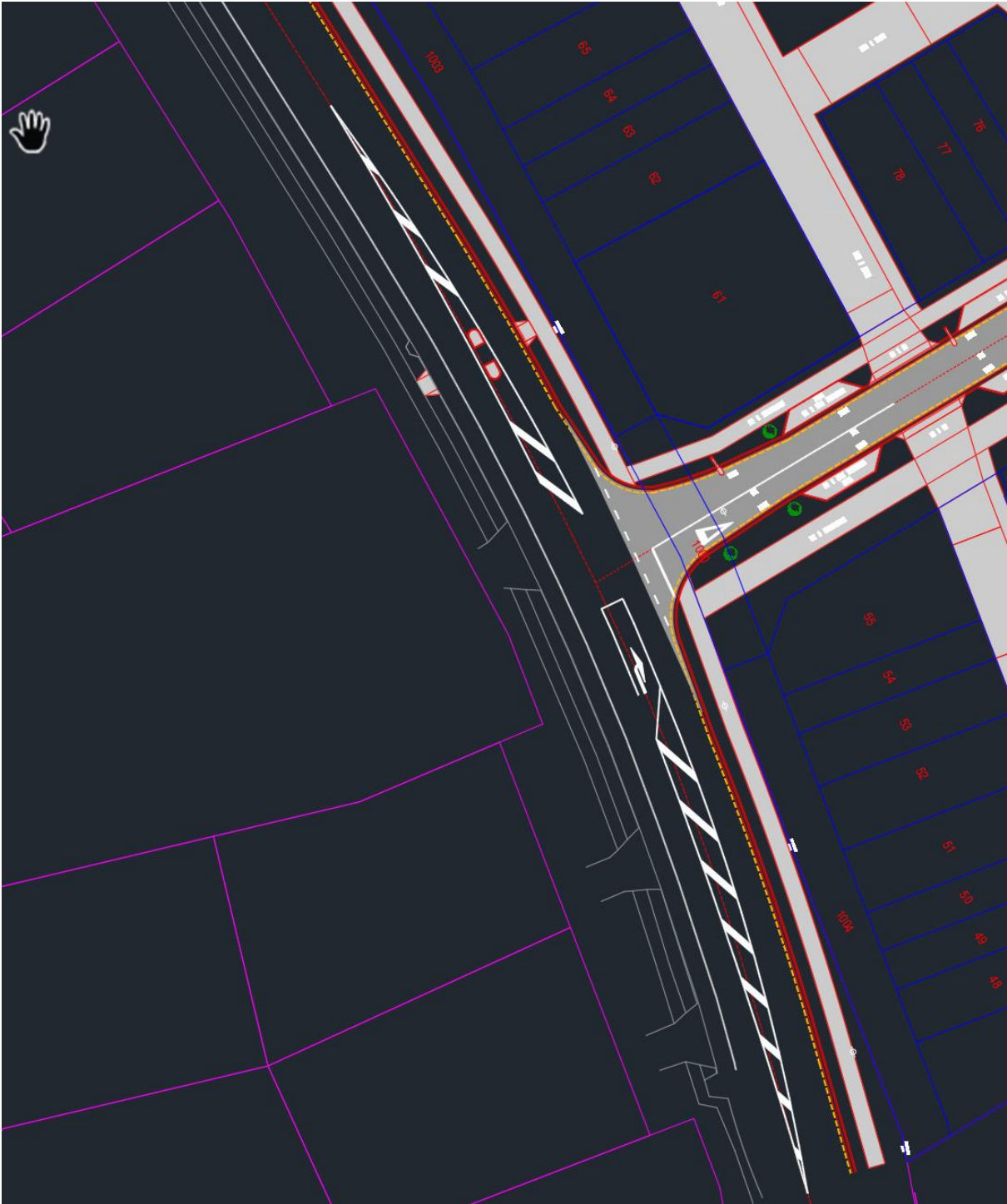


Figure 1: Proposed Road Layout – Great South Road (indicative)

Source: Maven Associates

T4 Please confirm if the proposed road widening on Great South Road, including compliant berm formation, can be accommodated within the current road boundary and what setbacks are proposed to accommodate the required infrastructure, noting that the road reserve width adjacent to the site narrows relative to the upstream and downstream width.

TPC Response

Although not clear in Figure 1. It is anticipated that a portion of the existing private land will be required to accommodate the road widening, right turn pocket and a suitable berm width. The final details of the road widening will be subject to discussions with Auckland Transport at the time of subdivision of 520 Great South Road and the new vested roads within the PPC area. As part of the resource consent application for 520 Great South Road, a 5.0 metre setback is proposed.

Figure 1 also illustrates a setback of 5.0 metres from the existing road boundary to accommodate any future widening of Great South Road. This is consistent with boundary setbacks immediately north of the site.

T5 Please clarify the distribution of the predicted traffic volumes at both Gatland Road and the new road intersections.

TPC Response

I have reviewed traffic flow diagrams provided in Section 3.3 of the report and can confirm there are some splits of turning movements at the new intersection that are not proportionate to those measured at the Gatland Road intersection.

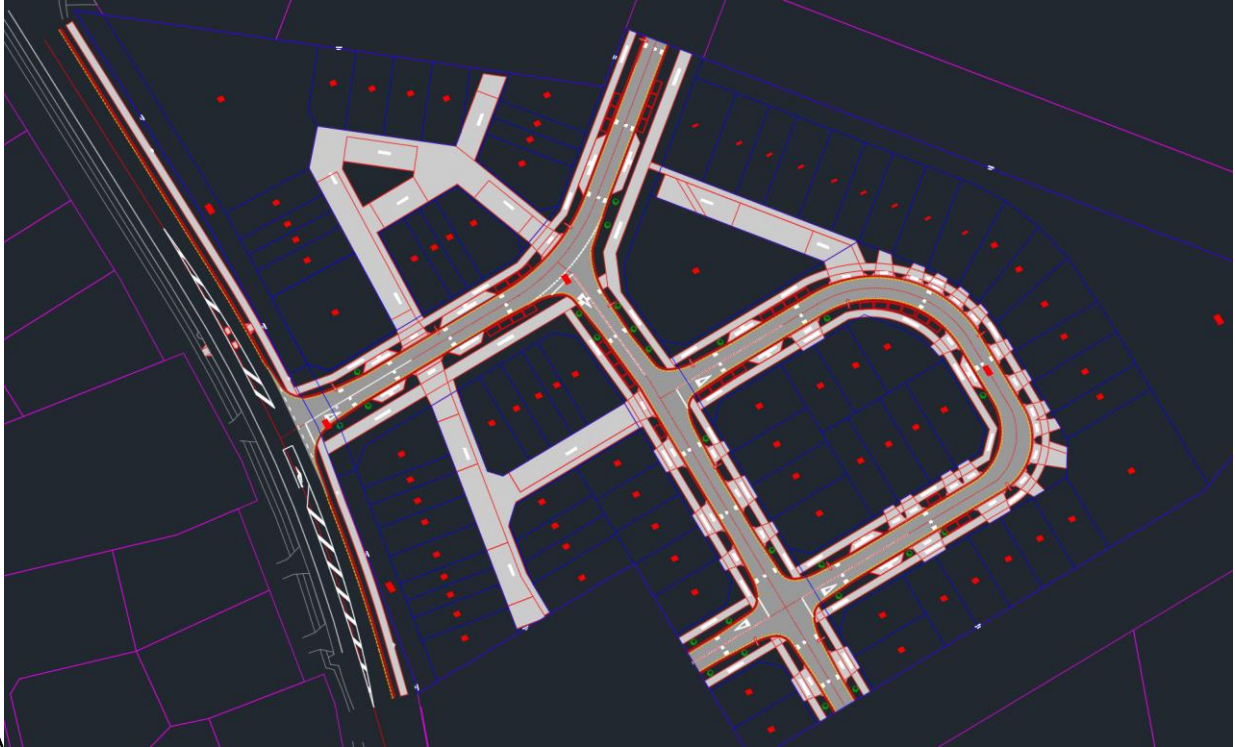
These occur in the midday and the PM periods only and relate to turning movements into the new road. If they were corrected, it would result in the right turning movements into the new road reducing and the left turn movements increasing. The changes in flows would be 5 vph and 10 vph, respectively. This change in flows is unlikely to have any material effect on the traffic modelling results and in fact will show a slightly better performance than reported.

T6 Please comment on how the PPC aligns with AUP objectives for urban growth and urban subdivision in relation to the future extension of the public road network to the FUZ land to the south.

TPC Response

As per T3 above, this is best illustrated by providing the information in the proposed subdivision application for 520 Great South Road.

The proposed road layout includes a new road that will extend towards the south and connect with the paper road along the southern boundary of the PPC area. This connection will provide the ability for future extensions into the FUZ land to the south.



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Figure 2: Indicative Road Network – 520 Great South Road
Source: Maven Associates

I trust that the above provides enough information to respond to the queries raised by Auckland Council. However, should Council have any further queries in relation to the above, I would be happy to meet with them to discuss further if needed.

Yours faithfully
TRAFFIC PLANNING CONSULTANTS LTD

A handwritten signature in blue ink, which appears to read "T. Langwell". The signature is stylized and cursive.

Todd Langwell

15th April 2020

Maven Associates
12-14 Walls Rd
Penrose
Attn: Will Moore

Hi Will,

Further to our meeting at your offices on 18th March and the information you provided subsequently, I understand you have a land development project involving an existing catchment and two downstream wastewater pumpstations that are at capacity during peak flows.

Our team have looked at this and put together a design for a wastewater pumpstation which was sent to you on 9th April 2020; this consisted of a pumpstation that would not pump during peak times (4 hours in the morning and 4 hours in the evening) either from the current existing catchment or from the proposed development.

The design of this pumpstation was based on two catchments:

Existing catchment	
ADWF	0.3 l/sec
PDWF	0.9 l/sec
PWWF	2.01 l/sec
Proposed catchment	
ADWF	0.67 l/sec
PDWF	2.01 l/sec
PWWF	4.49 l/sec
Total	
ADWF	0.97 l/sec
PDWF	2.91 l/sec
PWWF	6.50 l/sec

This pumpstation has two storage volume components, one is for the emergency storage volume (as per a typical Veolia pumpstation) of 8 hours storage of ADWF, and the second is for storing the on-peak storage volume based on 4 hours.

The calculation sheet shows that the emergency storage volume is 27.94m³ and the on-peak storage volume is 83.81m³ which brings the total storage volume to 111.74m³ which is between the pump start level and overflow level.

Since this is not practical / cost effective to have this in a single wetwell, we have employed the use of two horizontal storage tanks adjacent to the wetwell which will store most of the volume.

However this does mean that some of the storage tanks volume will be used twice per day, this will lead to some silt settling; to address this we will install a spray ball system in the ceiling of the tank which will flush out the tank upon pump stop.

The pumps also have been sized to cater for the PWWF of 6.5 l/sec, the theoretical flow rate for each pump is 7.52 l/sec.

With this solution, because we are taking in the upstream catchment, this pumpstation is taking pressure off the existing downstream pumpstations during peak times.

Glossary of terms used in this letter:

ADWF	Average Dry Weather Flow (average daily flow divided down to create l/sec)
PDWF	Peak Dry Weather Flow (ADWF with a peaking factor of 3 to cope with instantaneous flows during early morning and evening times)
PWWF	Peak Wet Weather Flow (ADWF with a peaking factor of 6.7 to allow for I&I during peak wet weather events). Otherwise known as Exceptional PDWF.
l/sec	Litres per second

I trust this is helpful, please contact me if you have any questions.

Warm regards,



Joel Mason
Director | Pump & Valve Specialties Ltd

14 May 2020

520 GSR Limited
PO Box 1190
Shortland Street
Auckland 1040

Attn: Mr Fraser Heaven

Dear Fraser

RE: Response to Request for Further Information - 520 Great South Road, Papakura, Auckland

(Our Reference: 15932.000.000_04)

1 Introduction

ENGEO Limited was requested by 520 GSR Limited to prepare this letter in response to a request for further information from Auckland Council regarding the application for a plan change to rezone the site at 520 Great South Road, Papakura, Auckland.

The intent of this letter is to respond to geotechnical queries from Council. These are primarily related to the Geotechnical Investigation Report (GIR) prepared by ENGEO dated 2 July 2019 (Project Reference 15932.000.000_02, Revision 1). We received comments from Sanjay Bangs on 6 April 2020 (forwarded from Rachel Morgan), titled Clause 23 RMA Further Information - 520 Great South Road Private Plan Change Request, with the below requests for further information.

Additionally, we understand that separately from the Plan Change, the Applicant has lodged an application for Resource Consent for a residential development on the site, and this is currently being processed by the Council.

Further to this request for information, we have also recently (post submission of our geotechnical investigation report) been supplied with a Geotechnical Investigation Report (prepared by others) for the property at 21 Gatland Road and a set of earthworks plans for the proposed development of the site. This new information is reflected in our responses below.

G1 Land Modifications

"Please assess the geotechnical constraints that may arise within the watercourse in the eastern corner of the site, and provide recommendations on further site investigations required."

The Plan Change is seeking to rezone the site to 'Mixed Housing Urban'. Future development will be assessed through the resource consent process. However, we understand that housing lots are proposed within the low lying portion of the site adjacent to the northern boundary (outside of the stream alignment).

The Maven Consultants earthworks plan set provided to us – reference 135014 dated 06/03/2020 indicates that fills of up to 3.5 m in height are proposed within the lots adjacent to the watercourse.

The retaining wall proposed along the northern extent of the lots in the area adjacent to the watercourse will need to be designed by a chartered professional engineer and this wall design should include consideration of the global stability of the wall.

Given the extent of the development proposed, it is expected that further geotechnical investigation and laboratory soils testing will be required along the alignment of the retaining wall and within this fill area. This work is required to determine the nature (strength and composition), of the underlying soils and to determine their susceptibility to settlement under the fill loads proposed.

As a result of this further investigation, it may be that settlement monitoring will be required for these fills. This will be addressed as part of the Resource Consent process. Monitoring is used to determine when the underlying soils have consolidated to an acceptable degree - such that any remaining settlement does pose a risk of unacceptable total or differential settlement to future dwellings.

The nature and location of detailed geotechnical site investigations required will be determined through the resource consent process. This is likely to include further boreholes within the north-eastern portion of the site and CPT investigations across the site.

G2 Watercourse

“Please provide comment on perceived geotechnical constraints if the low lying watercourse area was to be filled, and clarify what further site investigation will likely be required to assess these (for example, during a Resource Consent phase). This should also consider the point raised in G1 above.”

The Maven Consultants plan set provided shows that the watercourse along the northern boundary is to be left in place and that development will be limited to a zone set back from the stream as shown on the earthworks plan set.

Filling is limited to outside of the watercourse area as shown on the plans and will be retained by a specifically designed retaining wall.

Likely investigations and design considerations for this proposal will be considered through the Resource Consent process and are outlined in our response to query G1.

G3 21 Gatland Road

“Please clarify the nature of future site investigations for 21 Gatland Road.”

We have just recently (following submission of our report), been provided with a previously completed geotechnical investigation report for the property at 21 Gatland Road. This report was completed by Riley Consultants Limited in December 2018 (reference 180432-B), in support of a previous application for Resource Consent for that site.

As such, we consider that the investigation records and conclusions of that report are relevant to this plan change application and that no further geotechnical investigation works are required within the site at 21 Gatland Road to support this plan change application.

Further investigations regarding deep soil conditions may be required for resource consent, though the Maven Consultants plan set provided does not include the 21 Gatland Road site, so this will need to be determined once development plans are available for this area.

G4 Seismicity

“Please provide comment on likely seismic site class and also the proximity of the site to any active faults.”

ENGEO proposes to address this query within a ‘Supplementary GIR’ for the overall site including 21 Gatland Road. Seismic site class determination and location of the nearest fault(s) will be addressed as part of the Resource Consent process.

G5 Liquefaction

“Please clarify whether more detailed liquefaction analyses of a deeper soil profile will be a necessary requirement for further assessment (e.g. during a Resource Consent stage).”

Yes, a detailed liquefaction study that considers the deeper soil profile will be required. ENGEO proposes to address this query within a Supplementary GIR, to be undertaken as part of the Resource Consenting process.

2 Limitations

- i. We assume the remaining comment items will be addressed by other members of the design team.
- ii. This Limitation should be read in conjunction with the Engineering NZ / ACENZ Standard Terms of Engagement.
- iii. This report is not to be reproduced either wholly or in part without our prior written permission.

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned on (09) 972 2205 if you require any further information.

Report prepared by



Grant Caldwell
Engineering Geologist

Report reviewed by



Paul Fletcher, CMEngNZ (CPEng)
Associate Geotechnical Engineer

520 Great South Road CI 23 Summary

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Note: No further information has been requested by:

- Sarah Lindsay, Auckland Design Office

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
Planning, statutory and general matters – Sanjay Bangs, Plans & Places							
P1	Section 32 assessment	Please expand on the section 32 analysis contained in Section 9.0 of the Section 32 Assessment to outline the costs and benefits of the identified options at a finer grain level.	The section 32 analysis provided does not contain a sufficient depth of information to understand why the proposed rezoning is the most appropriate option. As per section 32(1)(c) RMA, such an assessment should contain a level of detail that corresponds to the scale and significance of effects anticipated. Section 32(2) requires an assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions. Further explanation is required to understand the benefits and costs of each option in relation to the anticipated effects of the rezoning, particularly in relation to transport, stormwater/flooding and urban design.	Refer to additional section 32 analysis within Section 9.0 of the Section 32 Assessment Report.	Information accepted.	Request satisfied.	N/A.
P2	Consultation	Please expand on the consultation undertaken with iwi groups outlined in	Further clarification is required to understand the nature of the consultation undertaken, in terms of	Refer to Section 6.3 of the Section 32 Assessment Report.	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
		Section 6.3 of the Section 32 Assessment report, including the timeframes, scope of engagement and documents provided to iwi groups (including all iwi groups with an interest in the land).	timeframes, scope and documents supplied to mana whenua in Section 6.3 of the Section 32 Assessment report. This should include all iwi groups with a potential interest in the land, as outlined the Auckland Council's mana whenua contacts facility: https://www.aucklandcouncil.govt.nz/building-and-consents/understanding-building-consents-process/prepare-application/prepare-resource-consent-application/Pages/find-hapu-iwi-contacts-for-your-area.aspx				
P3	Urban design	Please comment on the quality of access from the site to convenience retail, commercial services and community facilities.	The Section 32 Assessment and Urban Design Assessment do not comment on the proximity/access from the site to daily convenience retail, commercial services and community access, and the resultant effect on travel patterns and amenity for future residents. Comment is sought on access from the site to these amenities, both in the short term and once the surrounding Drury-Opaheke Structure Plan area has been urbanised and built-out.	The closest shop to the Plan Change area is located on 530 Great South Road approximately 150m to the south of the Plan Change area. This shop sells fruit and vegetables. From the Plan Change area it is 1.5km to the Drury village. There are continuous footpaths on the western side of Great South Road that extend between the Plan Change area and Drury Village. The topography is relatively flat so therefore it is a gentle and manageable walk. The Drury Village has all the required day to day needs There is a foodmarket, butcher, bakery, hairdresser, beauty salon, real estate agent, petrol station and car workshop to name a few of the businesses located at Drury Village. Papakura is located 3km north of the Plan Change area. Whilst Papakura is located further away there are footpaths that extend between the Plan Change area and the Centre and the topography is relatively flat. Papakura is a larger centre with a wide range of retail, commercial, civic and other amenities. Both centres can also be accessed via established public transport. The primary mode of public transport serving the site is the 376 bus route with two sets of bus	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
				<p>stops located within 400m on Great South Road. The 376 is a local service that runs between Drury and Papakura running at half hourly frequencies at peak times, down to hourly outside of the peaks. The Drury Central Train Station is due to be complete in 2024 and it is anticipated that bus services along Great South Road will increase to become a Frequent Transport Network. This is indicated in the Supporting Growth Alliance's preferred network for the South:</p> <p>https://www.supportinggrowth.govt.nz/assets/2019-Launch-Website/c1c1831b2e/Indicative-Network-2019-Maps-South.pdf</p> <p>To support this, as part of their resource consent application, the Plan Change Applicant is proposing a 5m setback from Great South Road to enable any necessary future road widening. Discussions with Auckland Transport on this matter are on-going as part of the resource consent process</p>			
P4	Future Urban Land Supply Strategy (FULSS)	Please expand on the assessment of the PPC against the FULSS in Section 6.2.2 of the Section 32 Assessment report to consider the matters set out in Appendix 1 and 2 of the FULSS,	<p>Appendix 1 of the FULSS outlines the high level reasoning underpinning the staging and sequencing set out in the FULSS. Appendix 2 identifies the specific considerations for each geographic location within Future Urban areas.</p> <p>Further assessment against these specific considerations is sought to better understand how the PPC aligns with the FULSS and the Auckland Plan 2050.</p>	Refer to Appendix 10 to the Section 32 Assessment Report.	Explanation appreciated	Request satisfied.	N/A.
P5	Please expand on the RPS Assessment provided as Appendix 4 to the request to clarify how	<p>Further clarification is sought in relation to the following RPS provisions:</p> <ul style="list-style-type: none"> • B2.2.2(5) and B2.4.2(2) which seeks to enable residential intensification close to centres, public 	Please expand on the RPS Assessment provided as Appendix 4 to the request to clarify how the PPC is consistent with the identified RPS matters.	Refer to Appendix 4 of the Section 32 Assessment Report.	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
	the PPC is consistent with the identified RPS matters.	<p>transport, social facilities and employment opportunities;</p> <ul style="list-style-type: none"> • B2.3.2 in relation to achieving the built form outcomes sought, particularly whether any precinct provisions are required to achieve these outcomes (also expressed in B2.4.2(8) relating to whether place-based planning tools are appropriate); • B7.3 in terms of whether a Stormwater Management Area – Flow Control is necessary to achieve hydrological mitigations outlined in the Stormwater Assessment (refer to Item HW4). 					
Traffic matters – Mat Collins, Flow Transport Specialists Ltd							
T1	Access visibility	Please provide further information on measures that could be put in place to address restricted visibility. The assessment should also address the additional volume of traffic likely to use the new road as an alternative.	The Transport Assessment (TA) states that visibility from Gatland Road/Great South Road intersection towards the south is restricted but concludes that increased use of this intersection will have minimal effect on the safety. An increase in traffic movements through this intersection will increase the likelihood of a crash occurring and, with a speed limit of 70 km/hr on Great South Road, the consequences of any crash are likely to be serious. Measures to eliminate the visibility shortfall, such as speed treatments, removal of sightline obstructions such as vegetation which sits within the road reserve should be considered.	<p>I agree the recommended measures, namely reduced speed limits and removal of vegetation to improve sight lines can address safety at the intersection. However, I considered that the removal of the vegetation will be enough to address given the likely flows added to the intersection will be minor.</p> <p>Both these measures are outside of the control of the applicant and are the responsibility of the road controlling authority, Auckland Transport.</p> <p>We understand the applicant is happy to work with Auckland Transport on the removal of the vegetation. Furthermore, I understand that Auckland Transport is reducing the current speed limit from</p>	<p>We accept the applicant's response and acknowledge that Auckland Transport approval for vegetation removal would be required.</p> <p>We suggest that a consent notice is placed on 21 Gatland Road and 520 Great South Road that prohibits vehicle access from the site to Gatland Road until adequate safe sight distances are achieved at the Great South</p>	Consent notice (or similar mechanism) recommended.	<p>The visibility issues at the Gatland Road/Great South Road intersection currently exist and can be remediated through undertaking tree trimming along Great South Road.</p> <p>Trimming trees to maintain vehicle sightlines is the responsibility of Auckland Transport as the road controlling authority and ultimately falls outside of the plan change or resource consent process. Regardless the applicant is working on resolving this issue with Auckland Transport through the resource consent process. Consequently we do not agree that another legal mechanism to address this issue is required.</p>

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
				<p>70km/h to 50km/h which will take effect in June 2020.</p> <p>With regards to an assessment of additional traffic using the new road, we understand Council's Traffic Engineer is referring to the new road through 520 Great South Road that will connect with Great South Road. If connected through to Gatland Road, there is the potential of traffic generated from other land use on Gatland Road to use the new road.</p> <p>Traffic modelling results provided in our traffic assessment show that there is spare capacity within intersection once the plan change area is fully developed. All movements at the intersection are operating at a Level of Service (LOS) "A" except for the right turn movement from the new road during the AM and PM periods which is operating at a LOS C.</p> <p>Any additional vehicle movements using the intersection and not relating to 520 Great South Road are only expected to do so if their destination or origin is towards the south. Otherwise using Gatland Road, would continue to be the preferred route. This will add turning movements for the left turn from and the right turn into the new road. The modelling indicates that both these movements would operate well under capacity and additional movements would not have an adverse effect on the intersection performance.</p>	Road/Gatland Road intersection.		
T2	Pedestrian network	Please confirm how pedestrian connectivity between the existing network and the development site will be provided.	Drury School is located approximately 1km south of the subject site (about a 13-minute walk) and is considered a reasonable walking distance. The Drury School website also indicates that the Site is within their walking school bus route. Both Rosehill College and Rosehill Intermediate are located to the	We anticipate that any future development of the plan change area will include new roads with a pedestrian network that will connect to Great South Road and a new footpath along Great South Road for the extent of the site frontage will be provided. This is proposed as part of a resource consent application that is now lodged	We accept that the footpath connections are proposed as part of the resource consent application. We suggest that a consent notice is placed on 520 and 522 Great South Road that a	Consent notice (or similar mechanism) recommended	A pedestrian network that will connect to Great South Road is proposed as part of the concurrent resource consent application which is currently being processed by the Council. If this consent isn't progressed, any future subdivision consent will need to show consistency with Policy E38.2(10) which requires subdivision to provide a street and block network which support a connected neighbourhood and pedestrian safety. As a

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
			<p>north of the site, on the opposite side of Great South Road.</p> <p>Further, there are existing bus stops on either side of Great South Road. Pedestrian demand can be expected to be generated, however the PPC does not confirm how this will be provided for.</p> <p>Can commentary please be provided on the existing pedestrian network, including any improvements considered necessary to ensure safe connections exist for those generated by the PPC.</p>	<p>with Council for the development of 520 Great South Road.</p> <p>Any footpath connection to the south can be provided on the east side of Great South Road where a footpath exists 80 metres south of site. Pedestrians are currently using the unsealed shoulder along this side of the road and as development occurs a more formal footpath can be provided.</p> <p>A footpath connection to the north is available on the west side of Great South Road and we anticipate a pedestrian crossing facility being established immediately north of the new intersection with Great South Road as the site is developed, and this is proposed in the resource consent application for 520 Great South Road. This will also provide a connection to the bus stops either side of Great South Road.</p>	<p>pedestrian connection to the existing footpath on Great South Road is to be provided before any subdivision or development.</p>		<p>result we are of the view that the need to provide pedestrian connections through to Great South Road is sufficiently covered by the E38 provisions and the lodged subdivision consent application. Therefore we do not agree that another legal mechanism is required to ensure that this connection is put in place.</p>
T3	Great South Road improvements	Please confirm the how mitigation measures for Great South Road will be delivered – relating to both Great South Road/Gatland Road sightline improvements and the new intersection.	<p>Section 8.3 of the Section 32 report states that “<i>TPC also assume that widening of Great South Road outside of the Plan Change area will occur to provide for a dedicated right turn pocket into the Plan Change area. The detailed design and location of this would be determined through a future resource consent process under E27 Transport. We note that this approach for assessment was accepted by Council and Auckland Transport as part of Plan Change 8 to the AUP (Kings College).</i>”</p> <p>The mitigation measures suggested by the applicant seem acceptable, however it is unclear how the delivery of the measures are secured through a future resource consent(s). It could be that once zoned, access relies on Gatland Road only, and the new access is not delivered. Council could then be faced with a situation where individual</p>	<p>An application is about to be lodged for the development of 520 Great South Road that is consistent with the proposed private plan change. A new intersection with Great South Road, a right turn pocket and a pedestrian crossing facility are proposed. An indicative layout of these features is included in Figure 1 below. Final details of the design will need to be addressed with Auckland Transport however this should provide enough confidence that these mitigations can be accommodated and are proposed as part of development on the site.</p> <p>With regards to the Great South Road / Gatland Road intersection. The mitigation measures have been discussed in response to T1.</p>	<p>Noted, refer to our response to Comment 1 and 2.</p>	Consent notice (or similar mechanism) recommended	<p>As previously highlighted a new intersection with Great South Road, a right turn pocket and a pedestrian crossing facility are proposed as part of the current resource consent application which is currently being processed by the Council. If this consent isn't progressed, any future subdivision consent will need to consider the effects from any significant increase in traffic volumes on the existing road network (E38.12.2(7)(g)). Furthermore, as noted above Great South Road is an arterial road and under E27.41(A6) restricted discretionary consent is required to construct a new vehicle crossing. One of the matters for discretion is the effect on the traffic network E27.8.2(10)(a). Therefore we are of the view that the need to design appropriate vehicle access to the site is sufficiently covered by the E27/E38 provisions and the lodged subdivision consent application, and we do not agree that another legal mechanism is required to ensure that this connection is put in place.</p>

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
T4	Great South Road improvements	Please confirm if the proposed road widening on Great South Road, including compliant berm formation, can be accommodated within the current road boundary and what setbacks are proposed to accommodate the required infrastructure, noting that the road reserve width adjacent to the site narrows relative to the upstream and downstream width.	<p>consents are sought, each of which are considered permitted, that cumulatively trigger the need for mitigation identified within the TA but cannot be required under the Auckland-wide rules of the AUP (i.e. if E27.6.1. Trip Generation is not triggered). This is particularly relevant for those measures that are not immediately adjacent to the property boundary.</p> <p>The delivery of the mitigation anticipated in the ITA, particularly that not adjacent to the development needs to be secured through a sound framework which ensures a safe and efficient outcome for all users, Auckland Transport and Auckland Council. At this time, a risk exists in relation to the best outcome when considering the effects of the PPC and how identified effects are mitigated.</p>	<p>Although not clear in Figure 1. It is anticipated that a portion of the existing private land will be required to accommodate the road widening, right turn pocket and a suitable berm width. The final details of the road widening will be subject to discussions with Auckland Transport at the time of subdivision of 520 Great South Road and the new vested roads within the PPC area. As part of the resource consent application for 520 Great South Road, a 5.0 metre setback is proposed.</p> <p>Figure 1 also illustrates a setback of 5.0 metres from the existing road boundary to accommodate any future widening of Great South Road. This is consistent with boundary setbacks immediately north of the site.</p>	<p><i>We note that the resource consent application includes widening.</i></p> <p><i>We suggest that a consent notice is placed on 520 and 522 Great South Road that a right-turn bay (and associated road widening) is to be provided before any subdivision or development.</i></p>	Consent notice (or similar mechanism) recommended	As previously the widening of Great South Road is being discussed as part of the current resource consent application which is currently being processed by the Council. If this consent isn't progressed, any future subdivision consent will need to consider the effects from any significant increase in traffic volumes on the existing road network (E38.12.2(7)(g)). Furthermore Great South Road is an arterial road and under E27.41(A6) restricted discretionary consent is required where there is a change of activity or intensification of existing activity on site. One of the matters for discretion is effect on the traffic network. Therefore we are of the view that the need to consider building setbacks to enable future widening of Great South Road is sufficiently covered by the E27/E38 provisions and the lodged subdivision consent application, and we do not agree that another legal mechanism is required to ensure that this connection is put in pace.
T5	Traffic generation	Please clarify the distribution of the predicted traffic volumes at both Gatland Road and the new road intersections.	<p>Section 3.3 in the TA states that "<i>The new flows have been distributed at the intersections in the same proportions as the existing turning movements recorded at the Great South Road/Gatland Road intersection.</i>" However, different turning volumes are calculated in some of the scenarios. For example, Figure 9 in the TA assumes a 50/50 in/out split at the new road during the midday period, but the same proportion split has not been applied at Gatland Road intersection. Although they could be minor differences, clarification of the assumed split from the applicant is requested.</p>	<p>I have reviewed traffic flow diagrams provided in Section 3.3 of the report and can confirm there are some splits of turning movements at the new intersection that are not proportionate to those measured at the Gatland Road intersection.</p> <p>These occur in the midday and the PM periods only and relate to turning movements into the new road. If they were corrected, it would result in the right turning movements into the new road reducing and the left turn movements increasing. The changes in flows would be 5 vph and 10 vph, respectively. This change in flows is unlikely to have any material effect on the traffic modelling results and in fact will show a slightly better performance than reported.</p>	Noted, we agree that the differences will have minor effects on the conclusions.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
T6	Future Road Connection	Please comment on how the PPC aligns with AUP objectives for urban growth and urban subdivision in relation to the future extension of the public road network to the FUZ land to the south.	In order to ensure connectivity between potential future urban areas, the transport network within the PPC should allow for future extension. Connectivity of the transport network reduces the reliance on private vehicle transport, increases accessibility, permeability and increases resilience. Connectivity is supported by the following AUP policies and objectives <ul style="list-style-type: none"> • Policy B2.3.2(1) • Policy B3.3.2(2) • Policy E38.3(10) • Objective B3.3.1.(1) 	As per T3 above, this is best illustrated by providing the information in the proposed subdivision application for 520 Great South Road. The proposed road layout includes a new road that will extend towards the south and connect with the paper road along the southern boundary of the PPC area. This connection will provide the ability for future extensions into the FUZ land to the south.	We're satisfied that the resource consent application includes a road connection to the FUZ land to the south.	Request satisfied.	N/A.
Development engineering matters – Arun Niravath, Regulatory Engineering South							
Advice notes (non-Clause 23)							
DE1	Wastewater capacity	Veolia Water have been consulted; Veolia Water have advised below- <i>“At present, there is insufficient capacity to service the proposed development. Upgrades to the downstream gravity wastewater network as well as pump station and storage will be required. Water network upgrades may also be required.”</i> As cited above, there is not enough capacity in the wastewater network to service the proposed area and there may be some upgrades required in the water supply reticulation. At the future subdivision or land use stage, in consultation with Veolia Water, necessary network upgrades shall be carried out to the infrastructure network.		Maven Engineering Consultants are providing engineering advice as part of the resource consent application currently being prepared to redevelop the site. Maven advise that a pump station can be provided on-site that would not pump during peak times either from the current existing catchment or from the proposed development. This on-site solution will take pressure off the existing downstream pump stations during peak times. This solution is currently being discussed with Veolia.	Information accepted.	Accepted	N/A.
Stormwater and flooding matters – Danny Curtis, Healthy Waters							
HW1	Stormwater Management Plan (SMP)	Pleas provide a Stormwater Management Plan to support the plan change. <u>Note:</u> It is recommended that a meeting between the applicant and Healthy	The plan change land is in the Future Urban zone and seeks to apply live zonings. An assessment of effects and proposed mitigations should be included in a SMP as part of the AEE and Section 32 Assessment to demonstrate how the Regional Policy	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
		Waters be arranged to discuss the requirements of the SMP.	Statement and regional plan provisions in Chapter E1 will be met, in particular policies E.1.3(3), E1.3(8) and E1.3(10). The SMP should: <ul style="list-style-type: none"> • address the Drury-Opaheke SMP and also discuss downstream effects; and • assessment why the proposed stormwater treatment and flood mitigation is the Best Practicable Option. 				
HW2	Network Discharge Consent (NDC)	Please confirm whether it is intended that the plan change come under the Council's Global NDC for stormwater discharges.	It is unclear from the plan change documents whether it is intended for the stormwater discharges from the site to come under the Council's global NDC. This should be clearly identified in the SMP. The Stormwater Assessment supplied does not constitute a SMP in accordance with the Council's NDC. A clear statement on the methods that are intended to be used to meet Schedule 4 NDC performance requirements is needed in the SMP and these should be tied to the proposed land use. It is recommended that a meeting between the applicant and Healthy Waters be arranged to discuss what is required to come under the NDC.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW3	Precinct	Please explain why precinct provisions have not been proposed to achieve the outcomes of the proposed stormwater management approach.	Section 8 of the stormwater assessment identifies options, including use of inert building materials, green outfalls, and quality treatment of all roads. These are not currently requirements of the AUP and therefore would may not be implemented without precinct provisions.	Section 8 of the stormwater assessment identifies options, including use of inert building materials, green outfalls, and quality treatment of all roads. These are not currently requirements of the AUP and therefore would may not be implemented without precinct provisions. Further discussions regarding appropriate precinct provisions will be required once an SMP is provided.	No information has been provided demonstrating suitable precinct provisions that would implement the stormwater management approach recommended by the SMP. Nor does there appear to be any explanation provided as to why they are not required.	Please clarify how the SMP will be addressed by the proposed AUP(OP), and whether precinct	The Plan Change proposes to utilise the underlying Auckland-wide provisions to manage stormwater. In particular to prove compliance with E8 & E9 resource consent applications must show how the adopted SMP requirements are met to confirm that stormwater discharge is "authorised" under the Network Discharge Consent (NDC). The SMP that has been prepared to support the Plan Change is intended to be adopted under the Council's Network Discharge

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
			Further discussions regarding appropriate precinct provisions will be required once an SMP is provided.		Healthy Waters appreciates that subdivision consents are lodged with the Council for the majority of this plan change area (although not all), but appropriate matters of discretion under the AUP are necessary to enable suitable conditions to be imposed. Healthy Waters seeks the opportunity to discuss appropriate precinct provisions to ensure that potential adverse effects on stream health are adequately mitigated.	provisions are required. We are happy to meet to discuss this further.	Consent as part of the concurrent resource consent application. Duplicating provisions within the precinct can cause interpretation issues later down the track when technical documents such as the SMP are updated. This can result in applicants being put through a consent due to noncompliance with precinct provisions even though they are consistent with an SMP adopted under the NDC.
HW4	SMAF Control	Please confirm whether SMAF Control is to apply to the site..	<p>The stormwater assessment appears to require hydrological mitigation but it is unclear whether the plan change proposes to apply the SMAF Control to the site.</p> <p>Further assessment of the erosion risks should be undertaken to understand whether the SMAF Control will adequately mitigate potential effects. Additional mitigation may be required. The SMP should identify whether this is the best practicable option.</p> <p>Advice note (non-Clause 23): If hydrological mitigation is proposed then it is recommended that the SMAF Control be applied to the land through this PPC.</p>	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW5	Stormwater Modelling	<p>Please provide further information is on the modelling to be included within the SMP including:</p> <ul style="list-style-type: none"> more description on the modelling 	Modelling information is required to understand the effects of the plan change in terms of increased stormwater runoff, peak flows and also effects on the flood plain both upstream and downstream.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
		<p>undertaken to support the development, in particular where there are discrepancies between the Council model and the TP108 graphical assessment.</p> <ul style="list-style-type: none"> demonstrate that the Council Rapid Model is suitable for undertaking the assessment of impacts from a specific site. confirmation that T+T have not amended the HW model as part of this work. provide clarification of the MPD imperviousness used for the rural areas. clarify why the model 	<p>It appears that the HW model has been used to assess flows within the watercourse through 520 Great South Road and TP108 graphical has been used to assess the local discharge from 520 Great South Road. However, there does not appear to be any commentary around how the development would impact the catchment flows. Even if this is negligible then this should still be worked through.</p> <p>Section 5.2 states that '<i>...rural areas increases by 20% compared to the ED scenario...</i>' Is this correct, or has the rural imperviousness increased to 20%? This clarification is required to confirm the model that is being used and the accuracy of flow volumes assumed through the site.</p>				
HW6	New asset ownership	Please provide discussion on the future ownership of the proposed stormwater devices.	It is unclear whether the proposed stormwater management approach will result public assets to be vested in Healthy Waters, or whether they would remain private assets The vesting of stormwater devices in Healthy Waters has implications for the design of these assets and future maintenance costs for Council.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW7	Proposed stormwater management	Please clarify the proposed stormwater management principles that have been adopted, and explain what	It is unclear what the actual principles for this development are. Greater discussion needs to be provided in relation to what could be considered	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
		stormwater management is considered to be the Best Practicable Option.	and why the proposed stormwater management is considered to be the Best Practicable Option. Swales are mentioned as being possible (Section 8.1 and 8.2); however, it is then proposed to convey runoff in a new pipe network (Section 8.3).				
HW8	SMP	Please provide a location plan of the plan change area to demonstrate how it fits in with the local Slippery Creek catchment.	Section 2.1 of the Stormwater Assessment discusses the catchment. However, it does not consider the site location in the context of the wider catchment. The site is located upstream of a very large floodplain associated with flows from the urban Papakura catchment. It is important to understand the effects of the plan change on the wider catchment.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW9	SMP	Please address the impact of the embankment approximately 60m upstream of the south eastern property boundary.	It is unclear from Section 2.4 of the Stormwater Assessment what the impact of the identified embankment would have on the environment. Does it create ponding water above the embankment, or does it impact the floodplain? This issue needs to be identified in order to determine the extent of effects and potential mitigation required.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW10	SMP	Please include further discussion about the receiving environment identified as a Significant Ecological Area (SEA) and implications to stormwater management because it is identified as a SEA.	Section 2.5 of the Stormwater Assessment discusses the receiving environment but does not identify the importance of it as a Significant Ecological Area. This is a relevant consideration in terms of effects on the environment and in determining the Best Practicable Option for stormwater management, particularly quality.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
HW11	SMP	Please clarify the extent of impervious coverage anticipated by the plan change.	Section 3 of the Stormwater Assessment identifies that the impervious coverage will increase, with greater runoff volumes and higher flows. However, the document is confusing with regard to what area it actually covers. This needs to be clarified.		Information accepted.	Request satisfied.	N/A.
HW12	SMP	Clarify that Table 5.2 identifies 100 year ARI peak flow levels rather than flood levels.	Table 5.2 indicates flood levels but they are not necessarily flood levels. This appears to be an error.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW13	SMP	Confirm whether the 24hour rainfall depth was used for the TP108 graphical assessment.	Section 6.2.1 discusses the assumption for runoff. Although HW assumes that the 24hr rainfall depths was used this is not explicitly identified in the document.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW14	Flooding	Clarify how it is proposed to manage discharges from each sub-catchment when flows will be passed forward into a floodplain.	Discharges to the south currently enter a floodplain area across 530 GSR. Will unattenuated flows increase the extent, depth or frequency of this flooding? Will it be affected by the Slippery Creek Catchment. Further information is required to determine the proposal not to require attenuation is the Best Practicable Option.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
HW15	Flooding	Confirm how Subcatchment B will work in relation to passing forward flows. This would need to rely on overland flow paths because there no pipe network	Section 6.1.3 discusses the proposal to pass forward flows without attenuation. Depending on what development area you consider, No. 522 GSR could be significantly affected with flows passed to the property every time there is rainfall. Insufficient information is provided to understand the downstream effects of passing flows forward without attenuation.	As per Appendix 1 of SMP provided,	Information accepted.	Request satisfied.	N/A.
Geotechnical matters – Shane Lander, Lander Geotechnical Consultants Ltd							

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
G1	Land modifications	Please assess the geotechnical constraints that may arise within the watercourse in the eastern corner of the site, and provide recommendations on further site investigations required.	<p>Historic aerial photos infer fills or land modifications may have occurred within the watercourse in the eastern corner of the site.</p> <p>It is recommended that ENGEO re-affirm their interpretation of land modifications on the site. Depending on the outcome, please clarify (in terms of Section 6.3.4) that if filling is likely to be present in the watercourse, whether there are any perceived geotechnical constraints or concerns. If there are concerns, ENGEO should also make recommendations on what (if any) site investigations will be required to address this (for example, during a Resource Consent phase).</p>	<p>The Plan Change is seeking to rezone the site to 'Mixed Housing Urban'. Future development will be assessed through the resource consent process. However, we understand that housing lots are proposed within the low lying portion of the site adjacent to the northern boundary (outside of the stream alignment).</p> <p>The Maven Consultants earthworks plan set provided to us – reference 135014 dated 06/03/2020 indicates that fills of up to 3.5 m in height are proposed within the lots adjacent to the watercourse.</p> <p>The retaining wall proposed along the northern extent of the lots in the area adjacent to the watercourse will need to be designed by a chartered professional engineer and this wall design should include consideration of the global stability of the wall.</p> <p>Given the extent of the development proposed, it is expected that further geotechnical investigation and laboratory soils testing will be required along the alignment of the retaining wall and within this fill area. This work is required to determine the nature (strength and composition), of the underlying soils and to determine their susceptibility to settlement under the fill loads proposed.</p> <p>As a result of this further investigation, it may be that settlement monitoring will be required for these fills. This will be addressed as part of the Resource Consent process. Monitoring is used to determine when the underlying soils have consolidated to an acceptable degree - such that any remaining settlement does pose a risk of unacceptable total or differential settlement to future dwellings.</p> <p>The nature and location of detailed geotechnical site investigations required will be determined through the resource</p>	<p>It is understood that details relating to proposed earthworks and future development of the land have occurred recently and a resource consent application is lodged with Council and currently in progress. We have not sighted the "Maven Consultants" earthworks plan cited in the ENGEO response to illustrate things, however, the constraints ENGEO consider necessary to address in this area as part of the (current) resource consent process relate to global stability and fill induced consolidation settlement of lots adjacent to the watercourse, and to future retaining wall designs where applicable. They have suggested future investigations would comprise further boreholes and CPT testing. We concur with their identification of perceived geotechnical risks here and that the geotechnical scope of work for Resource Consent should be aimed to address these.</p>	Request satisfied.	N/A.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
				consent process. This is likely to include further boreholes within the north-eastern portion of the site and CPT investigations across the site.			
G2	Watercourse	Please provide comment on perceived geotechnical constraints if the low lying watercourse area was to be filled, and clarify what further site investigations will likely be required to assess these (for example, during a Resource Consent phase). This should also consider the point raised in G1 above	No investigations have been undertaken in the invert of the low-lying shallow watercourse feature (as per Section 5.1 of the ENGEO report). As stated in Section 3 of the ENGEO report, it is "...proposed to ease the steeper contours and fill the lower lying areas...". Further clarification is sought on the perceived geotechnical constraints in this area and further site investigations required at the resource consents stage.	The Maven Consultants plan set provided shows that the watercourse along the northern boundary is to be left in place and that development will be limited to a zone set back from the stream as shown on the earthworks plan set. Filling is limited to outside of the watercourse area as shown on the plans and will be retained by a specifically designed retaining wall. Likely investigations and design considerations for this proposal will be considered through the Resource Consent process and are outlined in our response to query G1.	G2 Response Review: As for G1, we have not sighted the "Maven Consultants" earthworks plan cited to illustrate the ENGEO response. However, it is understood that the water course itself will remain in place, leaving the issues described in ENGEO's response for G1 to be addressed during the Resource Consent process. We concur with this.	Request satisfied.	N/A.
G3	21 Gatland Road	Please clarify the nature of future site investigations for 21 Gatland Road.	Number 21 Gatland Road is included in the plan change submission, but this block of land has not been investigated as part of the ENGEO geotechnical report, however future investigations are recommended here.	We have just recently (following submission of our report), been provided with a previously completed geotechnical investigation report for the property at 21 Gatland Road. This report was completed by Riley Consultants Limited in December 2018 (reference 180432-B), in support of a previous application for Resource Consent for that site. As such, we consider that the investigation records and conclusions of that report are relevant to this plan change application and that no further geotechnical investigation works are required within the site at 21 Gatland Road to support this plan change application. Further investigations regarding deep soil conditions may be required for resource consent, though the Maven Consultants plan set provided does not include the 21 Gatland Road site, so this will need to be	It appears there is an existing investigation covering the area encompassed by 21 Gatland Road, which has come to light since plan change report was prepared. ENGEO consider the investigations records and conclusions of that report are relevant to the plan change application.. We have not sighted the "Riley Consultants Limited" report cited to substantiate the ENGEO response on this matter, and do not know what these conclusions are or what investigations were undertaken.	Request not yet satisfied.	Please find report completed by Riley Consultants attached.

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
				determined once development plans are available for this area.	It is recommended ENGEO provide this report, or elaborate on the data and conclusions therein, as supporting information to inform the Plan Change, thereby confirming their (ENGEO's) response here before it can be closed out.		
G4	Seismicity	Please provide comment on likely seismic site class and also the proximity of the site to any active faults.	<p>The liquefaction potential reported in Section 6.5 of the ENGEO report is low based on the regional setting and hand auger borehole findings. In addition, NZS1170.5 seismic site class and seismicity have not been commented on in the ENGEO report.</p> <p>Further comment is sought on likely seismic site class (e.g. based on their regional knowledge) and also the proximity of the site to any active faults. Also, please clarify whether more detailed liquefaction analyses of a deeper soil profile will be a necessary requirement for further assessment (e.g. during a Resource Consent stage).</p>	ENGEO proposes to address this query within a 'Supplementary GIR' for the overall site including 21 Gatland Road. Seismic site class determination and location of the nearest fault(s) will be addressed as part of the Resource Consent process.	ENGEO propose to undertake the necessary work to address these matters as part of a supplementary study for the purposes of a Resource Consent process. We understand from Section 1 of the ENGEO response letter that a Resource Consent application has already been lodged with Council, but we are unsure whether ENGEO's proposed investigations to support the resource consent have accompanied this application.	Requests not yet satisfied – please provide analysis of proximity to active faults.	Please refer to the attached email from Engeo. The GNS New Zealand Active Fault Database indicates that there are no known active faults on site. The nearest active fault is the Wairoa North Fault located approximately 13.2 km west of the site. The Wairoa North Fault dips west and is a normal (extensional) type fault. Nearby inactive faults include the Glenbrooke and the Waiau Faults, located within 1 km of the site.
G5	Liquefaction	Please clarify whether more detailed liquefaction analyses of a deeper soil profile will be a necessary requirement for further assessment (e.g. during a Resource Consent stage).	Yes, a detailed liquefaction study that considers the deeper soil profile will be required. ENGEO proposes to address this query within a Supplementary GIR, to be undertaken as part of the Resource Consenting process.	<i>The proximity to active faults has not been responded to for the Plan Change, and it is recommended this assessment is made to inform the Plan Change as it should simply involve a desktop review of the GNS active faults database. Regarding the matters</i>			

#	Category of information	Specific Request	Reasons for request	Applicant response	AC comments	Status	Applicant response
					<i>of seismic site class and liquefaction potential, we concur with ENGEO's response and it is recommended that Council ensure this is adequately addressed in the Resource Consent geotechnical reporting.</i>		

Rebecca Sanders

From: Grant Caldwell <gcaldwell@engeo.co.nz>
Sent: Tuesday, 16 June 2020 8:56 AM
To: Rebecca Sanders
Subject: RE: PPC 520 Great South Road - Clause 23 request
Attachments: Appendix 8_Geotechnical Report_Rileys.pdf

Hi Rebecca,

Please find attached the Geotechnical Investigation Report for 21 Gatland Road, Drury completed by Riley Consultants.

As we understand it, the remaining follow-up query is addressed below:

“please provide analysis of proximity to active faults.”

We have reviewed the GNS New Zealand Active Fault Database, which indicates that there are no known active faults on site. The nearest active fault is the Wairoa North Fault located approximately 13.2 km west of the site. The Wairoa North Fault dips west and is a normal (extensional) type fault. Nearby inactive faults include the Glenbrooke and the Waiau Faults, located within 1 km of the site.

Please let us know if further information is required by the Council, or if the above queries need to be addressed in a letter response.

Regards,



NEW ZEALAND / AUSTRALIA / UNITED STATES

Grant Caldwell
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From: Rebecca Sanders [mailto:RebeccaS@barker.co.nz]
Sent: Monday, June 15, 2020 3:38 PM
To: Grant Caldwell
Cc: Rachel Morgan
Subject: RE: PPC 520 Great South Road - Clause 23 request

Hi Grant,

Just following up as to whether you will have this response for us today?

Ngā Mihi | Kind regards,

Rebecca Sanders
Associate

M +64 21 134 3351 T + 649 375 0900

PO Box 1986, Shortland Street, Auckland 1140
Level 4, Old South British Building,
3-13 Shortland Street, Auckland
Kerikeri | Whangarei | Warkworth | Auckland | Hamilton | Napier |
Christchurch
barker.co.nz

Wainono Investments Limited
21 Gatland Road
Drury
Auckland 2113

21 December 2018

Our Ref: 180432-B

Attention: Mr Nick Pollard

Dear Sir

GEOTECHNICAL INVESTIGATION PROPOSED SUBDIVISION 21 GATLAND ROAD, DRURY

1.0 Introduction

The following report has been prepared by Riley Consultants Ltd (RILEY) at the request of Mr Nick Pollard on behalf of Wainono Investments Limited. It presents the results of a geotechnical investigation for a proposed residential subdivision at the above address.

The purpose of the geotechnical investigation and report is to investigate subsoil conditions, assess overall ground stability, and provide general foundation recommendations for the proposed development in support of a resource consent application to Auckland Council (Council). A separate report has been prepared by RILEY to address land contamination aspects of the development.

2.0 Site Description and Proposed Development

The site is located on the southern side of Gatland Road. It is approximately 1.21ha and is currently used for pastoral farming purposes. An existing dwelling and multiple sheds are located in the central and western portions of the site.

The site is bounded by residential properties to the west and undeveloped farmland to the east and south. Site access is via Gatland Road to the north. From the architectural drawings in the Council property file, the existing dwelling is a concrete slab-on-grade and shallow strip type foundation.

From a review of Council GIS contour data, slopes on site range from flat to gently sloping (maximum 5 degrees). A shallow 'gully' feature is present and spans the site from the north to the south. A swampy area is noted adjacent to the southern boundary of the proposed subdivision where existing surface runoff flows into.

It is proposed to subdivide the site into 20 residential lots with a road accessway. The existing dwelling on Lot 20 will remain. The proposed access for the lots are via a spine road through the centre of the subdivision, and a current unformed road adjoining from proposed Lots 12, 14, and, 16. The cut and fill earthwork plans are not available at the time of report preparation.

3.0 Geology

With reference to the 1:250,000 Geological Map 3 of Auckland, together with our experience of the surrounding area, we infer the site is underlain by alluvial sediments of the Puketoka Formation of the Tauranga Group. A preliminary review of nearby machine hole drillings available on the New Zealand Geotechnical Database (NZGD) indicates alluvial soils overlie Waitemata Group deposits at approximately 20m to 22m depth.

The Puketoka deposits generally consist of pumiceous mud, sand, and gravel with muddy peat and lignite. It also consists of rhyolite pumice including non-welded ignimbrite, tephra and alluvial pumice deposits and massive micaceous sand. These soils are often highly variable in strength and character. The presence of these materials, typically beneath a capping of volcanic material, was confirmed on-site by the subsurface investigation. This material is also found beneath recent alluvial soil, which consists of very stiff organic silt within the swamp area.

4.0 Geotechnical Site Investigation

A site walkover appraisal was carried out by a RILEY geotechnical engineer on 5 November 2018. Results from on-site observations indicated no obvious evidence of past instability, erosion, slope slippage, or soil creep affecting the proposed development and their immediate surroundings.

Fourteen hand auger boreholes (HA1 to HA14) were drilled to a maximum depth of 5m between 11 and 16 October 2018 to assess the subsurface conditions in the vicinity of the proposed lots. The approximate borehole locations are shown on the attached site plan (RILEY Dwg: 180432-1). Pilcon shear vane testing was undertaken at 0.5m intervals in the cohesive soils. These results are also shown on RILEY cross sections (RILEY Dwg: 180432-2 to -4). Scala penetrometer testing was also conducted at the base of selected boreholes to investigate for competent material.

Representative bulk samples were recovered from TP1 and TP2 for laboratory testing. Standard compaction, and CBR testing was undertaken on the samples by WSP Opus Laboratories in Auckland. Two standard compaction tests were undertaken in accordance with NZS 4402 test 4.1.1, on material immediately below the topsoil to establish appropriate compaction control criteria for the engineered fill. Two sets of California bearing ratio (CBR) tests were undertaken in accordance with NZS 4402:1986 test 6.1.1 and test 2.1 with 2% and 4% lime added. The results are outlined in Section 6.0 below.

5.0 Subsurface Investigation

Subsoil conditions encountered at the borehole locations are summarised below, and a detailed description of the soils encountered during drilling is shown on the attached borehole logs:

- Topsoil was encountered within all boreholes (except HA14) to the depths ranging from 0.1m to 0.45m depth.
- Fill was not encountered in any of the boreholes during drilling.
- Volcanic deposits of the South Auckland Volcanic Field (SAVF) were encountered beneath the topsoil to depths between 0.5m and 2m within most of the boreholes except HA7, HA11, and HA14.

The volcanic deposits typically comprised silt, with varying amounts of clay and sand. The materials encountered were generally light brownish orange with a black mottled, non to slightly plastic. Shear strengths encountered during the investigation were generally of very stiff (117kPa to 199+kPa) consistency.

- Alluvial sediments of the Puketoka Formation were identified beneath the topsoil and/or volcanic deposits within all boreholes. These sediments generally consisted of light grey with red and pink mottled silts and clays. The plasticity ranges from non to high. Measured shear strengths typically ranged from stiff to hard (60kPa to 223+kPa) consistency.

Organic material was encountered within the lower lying southern and eastern portions of the site. These deposits were encountered at 2.5m depth extending to the base of the holes (5m). The organic clay/silt had a firm to stiff consistency with measured strengths of between 34kPa to 92kPa. The locations and the approximate depths of where organic material was encountered are shown on RILEY Dwg: 180432-1.

An approximate 600mm in thickness layer of weaker silt (40kPa to 58kPa consistency) was identified at a depth of 4m within HA8 and HA10 (eastern boundary).

- Groundwater was generally encountered at depths between 2.8m to 4m across the site during drilling except HA1 (dry at the time of drilling) and HA12 to HA14, where groundwater was measured between 0.4m and 1.0m below ground level. The soils above the water table were noted to be moist to wet.
- Standard piezometers were installed in HA1 (P1) and HA11 (P2). We visited the site on three further occasions to monitor the groundwater levels. The groundwater monitoring results are shown in Table 1.

Table 1: Summary of Monitoring Results

Borehole	Piezometer Screen Depths (m)	Groundwater Depths (m)/ Dates Monitored			
		Drilling (16/10/2018)	5/11/2018	12/11/2018	22/11/2018
P1(HA1)	1.0 to 5.0	Not Encountered	3.7	3.7	3.8
P2(HA11)	1.0 to 5.0	2.8	1.5	1.5	1.4

6.0 Laboratory Test Results

The standard compaction test results from samples recovered from TP1 and TP2 indicate maximum dry densities of 1.14t/m³ and 1.27t/m³ at optimum moisture contents of 42% and 36%, respectively. The full results are attached in Appendix C.

Selected CBR values of 9% and 3% were achieved, respectively. The additional 2% lime resulted in a minor improvement in soaked CBR in TP1 soils while a significant improvement was achieved in the TP2 soils. For both samples, with 2% lime added, the laboratory soaked CBR was 11%.

7.0 Geotechnical Considerations

On the basis of the geotechnical investigation, RILEY considers the proposed development to be generally suitable for the ground conditions encountered at the borehole locations, subject to the recommendations presented in the following sections.

The majority of the proposed lots are considered suitable for future buildings, subject to further input from a suitably experienced geotechnical engineer familiar with the content of this report. Based on the existing available information, the land within the swamp area (discussed in Section 7.3) will require further investigations prior to development.

7.1 Ground Stability

The risk of slope/ground instability affecting the proposed development is considered low, given the relatively high soil strengths encountered, together with the gentle land gradients within and around the proposed development.

7.2 Settlement

Organic material was identified during the investigation. The depths where these organic materials were encountered are shown on RILEY Dwg: 180432-1. It is considered that filling will likely be required in the lower (southern and eastern) portions of the site. The swampy and organic material are considered to be susceptible to settlement under fill and dwelling foundation loads.

Once earthworks design are available, calculations should be carried out to assess the settlement magnitude induced by earthfill and the likely timeframe for settlement to attenuate. Pre-loading may be required to accelerate settlement and reduce the magnitude of post-development long-term settlement. An assessment of required pre-loading heights and placement timeframe will need to be carried out. Settlement monitoring would also be required prior to development of the lots.

Alternatively, to mitigate this risk, the soft swampy and organic materials presents the lower portion of the site could be removed and replaced with engineered fill. However, this is considered unlikely to be economic as the organic material extends close to or beyond 5m.

7.3 Swamp and Groundwater Considerations

An overland flowpath was located in the central portion of the site and discharges into the swamp area. A relatively high groundwater level between 0.4m to 1m was identified within this area at the time of investigation.

The measured groundwater tables generally range from 2.8m to 4.9m (except the swamp area). The proposed cut is unknown at this stage. The groundwater level shown on RILEY Dwg: 180432-1, represents the groundwater level at the time of drilling and following monitoring. Possible effects on the groundwater table should be included as part of a geotechnical review when the earthworks plans are available.

7.4 Foundation Requirements

The underlying, relatively stiff, natural soils (typically the upper 2.5m depth) should be suitable to enable the future light timber framed residential structures to be supported on conventional shallow-type foundations (i.e. footings, pads, or short piles) designed in accordance with NZS: 3604:2011. The soils have been assessed as Class M to H, moderately to highly expansive, with respect to AS: 2870:1996. Class M and H is defined as moderately to highly reactive clays and silts, which can experience ground movement from moisture changes. This would need to be defined with further geotechnical inputs.

To minimise the risk of shrink/swell movement affecting the future structures, conventional shallow foundations designed in accordance with NZS: 3604:2011, should extend a minimum 800mm into stiff natural ground. Alternatively, a specific foundation design may be undertaken in accordance with AS: 2870:1996 (i.e. waffle type slabs). Foundations may be designed assuming the following preliminary parameters:

- 300kPa Ultimate Bearing Capacity (Geotechnical Ultimate).
- 150kPa Dependable Bearing Capacity (Ultimate Limit State).
- 100kPa Allowable Bearing Capacity (Serviceability Limit State).

As mentioned previously, low-strength organic soils were encountered beyond 2.5m depth in places. This organic material is not considered suitable to support any permanent structures. Whilst earthworks are envisaged to be minimal, care should be taken during site development to avoid 'over excavation' reducing the crust of stiff material. Where those materials are present, dwellings should be subject to specific design.

All foundations, within the 45-degree zone of influence of stormwater and sanitary sewer lines, will need to be specifically designed to ensure that foundation loads are transferred to the soils below this zone.

8.0 Site Development

8.1 Earthworks

No earthworks proposals are available at this time. However, due to the gentle contour of the site, we expect only minimal earthworks will be undertaken. We anticipate that earthworks will principally involve excavations for the road pavement, service lines, and cutting down of the high elevated areas, plus fill placement over the lower lying parts of the site.

Earthworks fill compaction testing should be undertaken at, or in excess of, the frequency recommended in NZS: 4431. We envisage that earthworks control will be undertaken principally using allowable air voids and shear strength criteria.

All fill should be placed in a controlled manner in accordance with NZS: 4431. Based on laboratory compaction testing, earth fill should achieve an average shear strength of 150kPa with no single result less than 120kPa. Additionally, fill should achieve an average air voids percentage less than 8% with no single result greater than 10%.

Surficial topsoil layers should be stripped prior to fill placement and stockpiled well clear of the earthwork areas and/or used for pre-loading. This material may be reused following engineered fill placement spread over the lots to a maximum depth of 300mm.

The site earthworks proposals should be reviewed by a geotechnical engineer familiar with the contents of this report. Any exposed areas of soft or organic soils within the proposed building platform should be inspected and undercut at the discretion of an experienced geotechnical practitioner.

8.2 Retaining Walls

All cuts and fills exceeding 500mm in height should be supported by specifically designed retaining walls and reviewed by an experienced geotechnical engineer.

Retaining walls should include a drainage layer behind the wall consisting of drainage metal (e.g. TNZ F/2) with a drainage coil at the base. All collected groundwater should be diverted to an appropriated designed reticulation system of outfall.

8.3 Road Subgrade California Bearing Ratios

The laboratory test results showed varying CBR results (3% and 9%) from natural soil recovered on-site without any improvement from lime. Lime stabilisation should improve the available CBR. The test results indicate that the CBR can be increased to 11% with the addition of 2% lime in both samples. Based on the laboratory test results, we recommend that a CBR value of 7% should be used for preliminary road pavement design with the adding of 2% lime (to 300mm depth). We recommend that a program of Scala testing be undertaken during site earthworks to confirm the available CBR at road subgrade level following improvement.

8.4 Services

Stormwater runoff from roofs and paved areas should be collected and piped to a public reticulation system, or outfall, away from the development.

We anticipate that most stormwater and sanitary sewer lines will be found either within stiff natural soils or engineered fill (e.g. stiff alluvial and volcanic fill). Consideration should be given to the presence of the softer organic soils present across the site and their effect on service line performance and construction. For pipelines interbedded in the organic soils, specific bedding modifications are best recommended when the trenches are excavated and the weaker materials at the invert level are examined in detail. This could also steepen the pipe gradients or increase pipe diameter.

It is recommended that installation of stormwater and sanitary sewer lines be undertaken utilising trench shields and/or battering in soils of low plasticity, provided the shoring methodology complies with the relevant New Zealand standards and legislation. The use of sumps and pumps, will likely, be required to control groundwater inflows during service line installation.

Further geotechnical comment will be required in this regard once detailed development drawings are available.

9.0 Conclusions

RILEY considers that the proposed development is suitable subject to the following recommendations:

- The risk of slope instability affecting the proposed development is considered low, given the relatively high soil strengths encountered in the soil profile, together with the gentle land gradients surrounding the proposal.
- No earthworks proposals are available at this time. However, due to the gentle contour of the site, we expect only minimal earthworks will be undertaken. The site earthworks proposals should be reviewed by a geotechnical engineer familiar with the contents of this report prior to subdivisional development.

- Settlement of the organic soils, and as a result of surcharge filling and building loads, could be mitigated through pre-loading.
- To minimise the risk of shrink/swell movement affecting the future structures, conventional shallow foundations designed in accordance with NZS: 3604:2011, should extend a minimum 800mm into stiff natural ground. Alternatively, a specific foundation design may be undertaken in accordance with AS: 2870:1996 (i.e. waffle type slabs) using the parameters provided in this report.
- All cuts and fills exceeding 500mm in height should be supported by specifically designed retaining walls and reviewed by an experienced geotechnical engineer.
- Based on lab testing results, we recommend that a CBR value of 7% should be used for preliminary road pavement design with 2% lime stabilisation.
- Stormwater runoff from roofs and paved areas should be carefully collected and piped to a public reticulation system or outfall away from the development.

10.0 Limitation

This report has been prepared solely for the benefit of Wainono Investments Limited as our client with respect to the brief. The reliance by other parties on the information or opinions contained in the report shall, without our prior review and agreement in writing, be at such parties' sole risk.

Recommendations and opinions in this email are based on data from limited test positions. The nature and continuity of subsoil conditions away from the test positions are inferred, and it must be appreciated that actual conditions could vary considerably from the assumed model.

During excavation and construction, the site should be examined by an engineer or engineering geologist competent to judge whether the exposed subsoils are compatible with the inferred conditions on which the email has been based. It is possible that the nature of the exposed subsoils may require further investigation and the modification of the design based upon this report.

Riley Consultants Ltd would be pleased to provide this service to Wainono Investments Limited and believes the project would benefit from such continuity. In any event, it is essential Riley Consultants Ltd is contacted if there is any variation in subsoil conditions from those described in the email as it may affect the design parameters recommended in the email.

If you have any queries, please do not hesitate to contact the undersigned.

Yours faithfully

RILEY CONSULTANTS LTD

Prepared by:



Minna Ji
Geotechnical Engineer

Reviewed by:



James Beaumont
Senior Geotechnical Engineer










Approved for issue by:











Brett Black
Director, CPEng

Enc: Borehole Logs (HA1 to HA14)
WSP Opus Laboratories Test Results
RILEY Dwgs: 180432-1 to -4

SOIL TYPES AND SYMBOLS

	FILL		CLAY
	TOPSOIL		PEAT
	SILT		GROUNDWATER LEVEL
	SAND		SCALA PENETROMETER
	GRAVEL	10,11,10	LAST 3 NUMBER OF BLOWS PER 50mm INCREMENT

ROCK TYPES AND SYMBOLS

	SANDSTONE		BASALT
	SILTSTONE		TUFF
	MUDSTONE		IGNIMBRITE
	LIMESTONE		GREYWACKE

SOIL STRENGTH CLASSIFICATION

FINE GRAINED COHESIVE SOILS

TERM	FIELD IDENTIFICATION	UNDRAINED SHEAR STRENGTH (kPa)
Very Soft (Vs)	Exudes between fingers when squeezed.	<12
Soft (S)	Easily indented by fingers.	12 – 25
Firm (F)	Indented only by strong finger pressure.	25 – 50
Stiff (St)	Indented by thumb pressure.	50 – 100
Very Stiff (VSt)	Indented by thumbnail.	100 – 200
Hard (H)	Difficult to indent by thumbnail.	200+

SPT & SCALA PENETROMETER RESULTS

TERM	SPT VALUE No. of BLOWS/300mm	SCALA PENETROMETER No. of BLOWS/100mm
very dense	>50	17+
dense	30 – 50	7 – 17
medium dense	10 – 30	3 – 7
loose	4 – 10	1 – 3
very loose	0 – 4	0 – 2






ROCK STRENGTH CLASSIFICATION

TERM	FIELD IDENTIFICATION	UNCONFINED UNIAXIAL COMPRESSIVE STRENGTH (MPa)
Extremely weak (EW)	Indented by thumbnail.	< 1
Very weak (VW)	Crumbles under firm blows with point of geological hammer. Can be peeled with pocket knife.	1 – 5
Weak (W)	Difficult to peel with pocket knife.	5 – 20
Moderately strong (MS)	Cannot be scraped or peeled with pocket knife.	20 – 50
Strong (S)	More than one blow of geological hammer to fracture.	50 – 100
Very strong (VS)	Many blows of geological hammer to break.	100 – 250
Extremely strong (ES)	Can only be chipped with geological hammer.	250+

MOISTURE CONDITION

Dry (D)	Looks and feels dry; powdery and friable.
Moist (M)	Feels cool; darkened in colour; no free water when remoulded.
Wet (W)	Feels cool; darkened in colour; free water forms on hands.
Saturated (S)	Free water is present on sample.

SAMPLE TYPES

	UNDISTURBED
	MACHINE AUGER DISTURBED
	HAND AUGER DISTURBED
	STANDARD PENETRATION TEST (solid cone)
	STANDARD PENETRATION TEST (hollow cone)

DRILLING METHOD

OB	OPEN BARREL
TT	TRIPLE TUBE
WB	WASH BORE
SH	UNDISTURBED SHELBY TUBE
RC	ROCK CORE
SPT	STANDARD PENETRATION TEST

FIELD TESTS

V	SHEAR VANE (corrected to BS:1377)
R	REMOULDED STRENGTH
P	POCKET PENETROMETER
CH	CLEGG HAMMER

INFORMATION BASED ON THE NZ GEOTECHNICAL SOCIETY INC. GUIDELINES FOR THE CLASSIFICATION AND DESCRIPTION OF SOIL AND ROCK FOR ENGINEERING PURPOSES



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HAND AUGER LOG

Project: 21 Gattland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 16-10-18 Finish Date: 16-10-18		Ground Level (m):		HA2	
Client: Wainono Investment Ltd				Hole Depth: 5.00 m		Sheet: 1 of 1	

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests	
					50	100	150	200	3	6	9	12					15
0.25	0.25	Topsoil	TOPSOIL														
	1.00	SAVF	SILT; light brown with trace black mottle. Very stiff, non plastic, micaceous [SOUTH AUCKLAND VOLCANIC FIELD].	x													✓ V= 183 R= 110
	1.50		Silty CLAY; light orange with trace grey mottles. Stiff, moderately plastic [PUKETOKA FORMATION].	x													✓ V= 90 R= 53
	1.50		1.40 m Grades to light brown with grey with orange mottles.	x													✓ V= 87 R= 43
	2.00		SILT, minor clay, whitish grey with pink and orange mottles. Slightly plastic; pumiceous.	x													✓ V= 93 R= 50
	2.80	Puketoka Formation	CLAY, minor silt; bluish grey with orange mottles. moderately to highly plastic.	x													✓ V= 133 R= 63
	2.80		3.00 m 100mm of Sandy SILT; orange, non plastic.	x													✓ V= 83 R= 60
	3.90		Organic CLAY; dark brown. Moderately plastic; amorphous.	x													✓ V= 113 R= 60
	4.10		CLAY, minor SILT; grey and orange with trace black mottles. Moderately to highly plastic.	x													✓ V= 80 R= 50
	4.90		Sandy SILT; brown grey, non plastic; sand, fine.	x													✓ V= 83 R= 50
	5.00		EOH @ 5.00 m	x													✓ V= 223+

RILEY\AKL\GLB Log RILEY HA (AKL) NO MAP 180432-BOREHOLE LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by GINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample			▼ Scala Penetrometer - blows/50mm ⊕ Permeability Test ▼ Schmidt Hammer ✓ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ↓ Water Strike (1st, 2nd ...) ↑ Water Rise (1st, 2nd ...) and ⊕ Rise Time (minutes)			GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 3.7 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth			Remarks SAVF* - South Auckland Volcanic Field		
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All dimensions in metres Scale 1:41	Shear Vane No. 4496	Logged by: AHL	Checked by: <i>cf</i>
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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 16-10-18 Finish Date: 16-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.00 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12				
	0.30	SAVF Topsoil	TOPSOIL												DM		
	0.50		SILT; red brown with black mottle. Very stiff, non plastic (SOUTH AUCKLAND VOLCANIC FIELD).	x											M		✓ V= 225+
	0.80		Silty CLAY; light orange brown with grey mottles. Very stiff, moderately plastic (PUKETOKA FORMATION).	x													✓ V= 96 R= 67
	1.30		SILT, trace clay; light orange brown with grey mottles. Very stiff, moderately plastic.	x													✓ V= 120 R= 53
	1.50	Puketoka Formation	CLAY, minor silt; light grey with orange mottles. Stiff to very stiff, moderately to highly plastic.	x													✓ V= 123 R= 73
	2.00		1.50 m Grades to greyish white with orange and pink mottles. Pumiceous. 2.00 m Grades to light grey with orange mottles.	x													
	3.20		SILT, minor clay, trace sand; light brown grey with orange mottles. Stiff to very stiff, non plastic.	x											WS		✓ V= 100 R= 50
	3.80		3.80 m Grades to minor sand, no clay. Non plastic, sand, fine.	x										S			✓ V= 70 R= 33
	4.50		4.50 m Grades to brown grey.	x													✓ V= 80 R= 20
	5.00		4.90 m Grades to minor clay, trace sand, fine	x													✓ V= 100 R= 33
	5.00		EOH @ 5.00 m	x											MW		✓ V= 183 R= 60

RILEYAKL.GLB Log RILEY HA (AKL) NO MAP 180432-BOREHOLE LOGSS.GPJ -<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations:

Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered
 Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense

● Small Disturbed Sample
 | Large Disturbed Sample
 ■ U100 Undisturbed Sample

- ▼ Scala Penetrometer - blows/50mm
- ⬇ Permeability Test
- ⬇ Schmidt Hammer
- ✓ Insitu Vane Shear Strength (kPa)
V=Peak, R=Residual, UTP=Unable to penetrate
- ⬇ Water Strike (1st, 2nd ...)
- ⬆ Water Rise (1st, 2nd ...) and Rise Time (minutes)

GROUNDWATER

- None
- Slow Seep (depth 3.7 m)
- Rapid Inflow (depth)

HOLE TERMINATED DUE TO:
Target Depth

Remarks

SAVF* - South Auckland Volcanic Field

All dimensions in metres
Scale 1:41

Shear Vane No.
4496

Logged by:
AHL

Checked by:
Cef



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 Fax:

HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 16-10-18 Finish Date: 16-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.05 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests	
						50	100	150	200	3	6	9	12					15
	0.35	TOPSOIL																
	1.00	SOUTH AUCKLAND VOLCANIC FIELD	SILT, minor clay, light brownish orange, very stiff, slightly plastic [SOUTH AUCKLAND VOLCANIC FIELD].	X	Δ												✓ V= 149 R= 28	
	2.00		Clayey SILT; light orange and light grey mixed, Very stiff, moderately plastic [PUKETOKA FORMATION].	X	Δ													✓ V= 117 R= 26
	2.50		CLAY, some silt; bluish grey with trace red mottles. Stiff to very stiff, moderately plastic.	X	Δ													✓ V= 166 R= 114
	3.40		Silty CLAY; light grey to white with red mottles. Very stiff, moderately plastic.	X	Δ													✓ V= 185 R= 52
	3.80	PUKETOKA FORMATION	3.70 m - 3.80 m 100mm of bright red clay.	X	Δ													
	4.10		CLAY, some silt; light yellowish brown with red and orange mottles. Very stiff, moderately plastic.	X	Δ													✓ V= 108 R= 52
	5.00		CLAY, minor silt, trace sand, trace gravel; white. Very stiff, moderately plastic; Sand, fine; gravel, fine, pumiceous.	X	Δ												✓ V= 199	
	5.05		EOH @ 5.05 m														✓ V= 126 R= 44	
	6.00																✓ V= 131 R= 38	
	7.00																✓ V= 102 R= 26	

RILEYAKL_GLB_Log RILEY HA (AKL) ICG MAP 180432- BOREHOLE LOGS.GPJ 11/12/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample	▾ Scala Penetrometer - blows/50mm ⊕ Permeability Test ⊖ Schmidt Hammer ∨ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ⚡ Water Strike (1st, 2nd ...) ⬆ Water Rise (1st, 2nd ...) and Rise Time (minutes)	GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 3.0 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth	Remarks 3.00 m: Water strike - Very slow seep
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All dimensions in metres Scale 1:41	Shear Vane No. 1706	Logged by: RTS	Checked by: <i>CJP</i>
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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 16-10-18 Finish Date: 16-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.00 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12				
	0.25	Topsoil	TOPSOIL														
	0.60	SAVF	SILT, minor clay; orangish brown. Very stiff, slightly plastic [SOUTH AUCKLAND VOLCANIC FIELD].	X													✓ V= 111 R= 58
	1		Silty CLAY; brownish light grey with trace orange mottles. Stiff to very stiff	X													✓ V= 105 R= 62
	1.60		SILT, minor clay; white	X													✓ V= 126 R= 77
	2.2.05		Silty CLAY; light grey with orange mottles. Very stiff, moderately plastic.	X													✓ V= 141 R= 77
	3		2.80 m - 3.25 m Orange and light grey mixed with trace organics. Organics, amorphous.	X													✓ V= 126 R= 80
			3.20 m Grades to minor organics, amorphous	X													✓ V= 163 R= 123
	4		4.10 m Grades to trace organic, amorphous	X													✓ V= 151 R= 52
	4.15		Organic CLAY; dark brown. Stiff, moderately to highly plastic.	X													✓ V= 62 R= 31
	4.45		Clayey SILT, minor organics, trace sand; light brownish grey. Stiff, moderately plastic; sand, fine; organics, amorphous.	X													✓ V= 58 R= 22
	5.00		EOH @ 5.00 m	X													

RILEYAKL_QLB_Log_RILEY_HA(AKL)_NO_MAP_180432-BOREHOLE LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample		▼ Scala Penetrometer - blows/50mm ⊕ Permeability Test ▼ Schmidt Hammer ▽ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ↓ Water Strike (1st, 2nd ...) ↑ Water Rise (1st, 2nd ...) and ⊕ Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 4.0 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks SAVF* - South Auckland Volcanic Field	
All dimensions in metres Scale 1:41		Shear Vane No. 608		Logged by: GB		Checked by: 	



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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 16-10-18 Finish Date: 16-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.00 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12				
	0.30	Topsoil	TOPSOIL														
	0.75	SAVF	SILT, trace clay; brownish orange. Very stiff, non plastic [SOUTH AUCKLAND VOLCANIC FIELD].	X	Δ												✓ V= 160 R= 25
	1		Clayey SILT; trace gravel; grey with trace orange mottles. Very stiff, slightly plastic	X	Δ												✓ V= 166 R= 105
	1.50		SILT, minor clay, minor gravel; light greyish brown. Stiff, slightly plastic; gravel, fine; pumiceous.	X	Δ												✓ V= 111 R= 34
	1.95		Silty CLAY; light grey with minor orange mottles. Very stiff, moderately plastic.	X	Δ												✓ V= 74 R= 43
	2		2.80 m - 2.95 m Grades to greyish white with orange mottles.	X	Δ												✓ V= 123 R= 55
	3				X	Δ											✓ V= 105 R= 52
	3.50		Clayey SILT; greyish white with orange mottles. Stiff, moderately plastic.	X	Δ												✓ V= 105 R= 62
	4.00		SILT, minor to some clay; white with trace orange mottles. Very stiff, slightly to moderately plastic; sand, fine.	X	Δ												✓ V= 95 R= 34
	5.00				X	Δ											✓ V= 154 R= 28
	5.00		EOH @ 5.00 m	X	Δ												✓ V= 123 R= 18

RILEYAKL.GLB Log RILEY HA (AKL) NO MAP 180432- BOREHOLE LOGS.GPJ 11/12/2018 16:05 Produced by g|N|T Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample		▼ Scale Penetrometer - blows/50mm ⊕ Permeability Test ▼ Schmidt Hammer ▼ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ↓ Water Strike (1st, 2nd ...) ↑ Water Rise (1st, 2nd ...) and ⊕ Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 3.7 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks SAVF* - South Auckland Volcanic Field	
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All dimensions in metres Scale 1:41		Shear Vane No. 608	Logged by: GB	Checked by: <i>CS</i>
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HAND AUGER LOG

Project: 21 Gattland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 11-10-18 Finish Date: 11-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.00 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)					Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12	15				
	0.35	Topsoil	TOPSOIL, dark brown.															
	1.30		0.35 m - 0.50 m Grades to brownish orange, dry to moist. SILT, minor to some clay, light grey with trace orange mottles. Very stiff, slightly plastic, pumiceous [PUKETOKA FORMATION].															✓ V= 215+ ✓ V= 145 R= 31
	2.00		Silty CLAY; light grey with trace to minor orange mottles. Very stiff, slightly to moderately plastic, pumiceous.															✓ V= 135 R= 68
	3.50		1.90 m Grades to clayey SILT, orange with minor light grey and trace pink mottles.															✓ V= 123 R= 62
	4.60		Silty CLAY; grey with minor orange and trace pink mottles. Very stiff, moderately plastic.															✓ V= 126 R= 77
	5.00		2.10 m Grades to brownish grey with minor pink and trace orange mottles.															✓ V= 138 R= 92
			3.10 m Grades to clayey SILT, slightly to moderately plastic.															✓ V= 120 R= 62
			Clayey SILT, trace sand; light grey with trace orange mottles. Stiff, slightly to moderately plastic; sand, fine.															✓ V= 80 R= 31
			Organic SILT, minor clay; dark brown with dark specks. stiff to very stiff, slightly plastic; organics, amorphous.															✓ V= 52 R= 15
	5.00		EOH @ 5.00 m															✓ V= 123 R= 25

RILEY\AKL\GLOB Log RILEY HA (AKL) NO MAP 180432- BOREHOLE LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample		▼ Scala Penetrometer - blows/50mm ▽ Permeability Test ▾ Schmidt Hammer ∨ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ⚡ Water Strike (1st, 2nd ...) ⬆ Water Rise (1st, 2nd ...) and Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 3.1 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks 	
All dimensions in metres Scale 1:41		Shear Vane No. 608		Logged by: GB		Checked by: 	



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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 11-10-18 Finish Date: 11-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.00 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12				
0.10	0.10	SAVF	TOPSOIL.	x													
0.50	0.50		SILT; reddish brown with trace black mottles. Very stiff, non plastic [SOUTH AUCKLAND VOLCANIC FIELD].	x													✓ V= 223+
1			CLAY, some silt; grey with orange mottles. Very stiff, moderately plastic [PUKETOKA FORMATION].	x													✓ V= 183 R= 133
			1.20 m Grades to trace white specks, pumiceous.														✓ V= 173 R= 133
2			1.80 m Grades to minor silt, light grey and orange mixed; moderately to highly plastic.														✓ V= 163 R= 110
			2.20 m Grades to pink, orange and grey mixed.														✓ V= 127 R= 83
2.90		Puketoka Formation	Silty CLAY; pinkish grey with red mottles, stiff, slightly to moderately plastic.	x													✓ V= 117 R= 67
3			3.50 m Grades to light orange.														✓ V= 83 R= 33
3.80			SILT, trace clay; whitish grey. Firm, non to slightly plastic; pumiceous.	x													✓ V= 40 R= 17
4			SILT, trace gravel; grey. Very stiff to hard; non plastic; pumiceous.	x													✓ V= 223+
4.40				x													✓ V= 223+
5.00	5.00		EOH @ 5.00 m	x													

RILEYAKL_GLB Log RILEY HA (AKL) NO MAP 180432-BOREHOLE LOGS.GPJ 11/11/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample ■ Large Disturbed Sample ■ U100 Undisturbed Sample		▾ Scala Penetrometer - blows/50mm ▾ Permeability Test ▾ Schmidt Hammer ▾ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ▾ Water Strike (1st, 2nd ...) ▾ Water Rise (1st, 2nd ...) and Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 4.0 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks SAVF* - South Auckland Volcanic Field	
All dimensions in metres Scale 1:41		Shear Vane No. 4494		Logged by: AL		Checked by: <i>[Signature]</i>	



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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 11-10-18 Finish Date: 11-10-18		Ground Level (m):		Co-Ordinates ():	
Client: Wainono Investment Ltd		Hole Depth: 5.05 m		Sheet: 1 of 1			

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12				
	0.30	Topsoil	TOPSOIL; brown.														
	0.70	SAVF*	SILT, trace sand, light brownish orange. Very stiff, non plastic; sand, fine [SOUTH AUCKLAND VOLCANIC FIELD].	x x x	△												✓ V= 155 R= 32
1	1.30		SILT, trace clay, light brown. Stiff, non plastic [PUKETOKA FORMATION].	x x x	△ x												✓ V= 78 R= 40
	1.90		SILT; brownish white. Stiff, non plastic; pumiceous.	x x x	△ x												✓ V= 57 R= 20
2	2.50		Silty CLAY; light bluish grey. Very stiff, moderately plastic.	x x x	△												✓ V= 144 R= 86
3	3.90	Puketokā Formation	CLAY, minor silt; grey with orange mottle. Very stiff, moderately to highly plastic.	x x x	△ x												✓ V= 201+
	4.40		3.80 m Grades to some silt, grey.	x x x	△												✓ V= 144 R= 129
4	4.40		SILT, trace clay, trace sand, grey with orange mottles. Very stiff, non plastic; sand, fine.	x x x	△												✓ V= 132 R= 89
	5.05		Pumiceous; white. Stiff, non plastic.	x x x	△												✓ V= 146 R= 63
	5.05		4.80 m Grades to minor clay, white with trace orange mottles; slightly plastic.	x x x	△ x												✓ V= 132 R= 52
	5.05		EOH @ 5.05 m	x x x	△ x												✓ V= 69 R= 43
6																	No. 1 1, 1, 1, 1, 1, 2, 1, 2, 1, 1, 1, 2, 1, 2, 2, 2, 2, 2, 2, 2, 2, 2, 3, 4, 5, 6, 8, 8, 9, 9, 9, 9, 10, 8, 10, 10, 10
7																	

RILEYAKS_GLB_Log RILEY HA (AKL) NO MAP 180432- BOREHOLE LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample		Scale Penetrometer - blows/50mm Permeability Test Schmidt Hammer Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate Water Strike (1st, 2nd ...) Water Rise (1st, 2nd ...) and Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 4.7 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks SAVF* - South Auckland Volcanic Field	
All dimensions in metres Scale 1:41		Shear Vane No. 1743		Logged by: AL		Checked by: 	



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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 11-10-18 Finish Date: 11-10-18		Ground Level (m):		HA10	
Client: Wainono Investment Ltd				Hole Depth: 5.00 m		Sheet: 1 of 1	

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests	
					50	100	150	200	3	6	9	12					15
	0.20	TOPSOIL															
	0.60	SAVF*	SILT, trace clay; brownish orange. Very stiff, non plastic [AUCKLAND VOLCANIC FIELD].	x x x x													✓ V= 215+
	1.40		SILT, minor clay; light orange. Very stiff, non to slightly plastic [PUKETOKA FORMATION].	x x x x													✓ V= 138 R= 25
	2.00		CLAY, some silt; orange and light grey mixed. Very stiff, moderately to highly plastic. 1.80 m Grades to minor silt; light grey with orange mottles.	x x x x													✓ V= 169 R= 108
	3.50			x x x x													✓ V= 185 R= 126
	3.80		Silty CLAY; light orange and orange mixed. Very stiff, moderately plastic.	x x x x													✓ V= 154 R= 92
	4.20		SILT, minor clay; light whitish orange. Stiff, slightly plastic; purriceous.	x x x x													✓ V= 163 R= 92
	4.20		Silty CLAY; grey. Very stiff, slightly to moderately plastic.	x x x x													✓ V= 80 R= 52
	5.00		EOH @ 5.00 m	x x x x													✓ V= 58 R= 15
	5.00			x x x x													✓ V= 148 R= 68
	5.00			x x x x													✓ V= 215+

RILEY\AKL_GLB_Log_RILEY_HA\AKL_INO_MAP_180432_BOREHOLE_LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense • Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample		▼ Scala Penetrometer - blows/50mm ⊕ Permeability Test ▼ Schmidt Hammer ✓ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ↓ Water Strike (1st, 2nd ...) ↑ Water Rise (1st, 2nd ...) and Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 3.0 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks SAVF* - South Auckland Volcanic Field	
All dimensions in metres Scale 1:41			Shear Vane No. 608		Logged by: AL	Checked by: 	

HAND AUGER LOG

Project: 21 Gattland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 11-10-18 Finish Date: 11-10-18		Ground Level (m):		HA11/P2	
Client: Wainono Investment Ltd				Hole Depth: 4.65 m		Sheet: 1 of 1	

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)					Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12	15				
0.20		Topsoil																
0.80			SILT, minor clay, trace sand; light brownish yellow. Very stiff, non plastic (PUKETOKA FORMATION).															✓ V= 171 R= 40
1.10			SILT, minor clay, brownish light grey. Very stiff to stiff, slightly plastic.															✓ V= 57 R= 26
1.50			SILT, some clay, light grey. Stiff, slightly plastic.															✓ V= 88 R= 43
2.00			Silty CLAY, trace sand; light grey. Stiff, moderately plastic; sand, fine.															✓ V= 88 R= 43
2.50			2.00 m Grades to light yellowish grey.															✓ V= 139 R= 68
3.00			2.50 m Grades to very stiff.															✓ V= 97 R= 34
3.00			CLAY, some silt, trace to minor sand; light greyish yellow with orange mottles. Very stiff, moderately plastic; sand, fine.															✓ V= 139 R= 85
4.405			Silty CLAY, some organics; light brownish grey. Very stiff, slightly to moderately plastic; organics, amorphous.															✓ V= 117 R= 43
4.65			EOH @ 4.65 m															✓ V= 199+
5																		No. 11 4, 3, 4, 7, 7, 8, 8, 8, 7, 6, 6, 6, 5, 4, 5, 11, 11, 13

RILEYAKL.GLB Log RILEY HA (AKL) NO MAP 180432-BOREHOLE LOGS.GPJ <<DrawingFiles>> 11/12/2018 16:05 Produced by GINT Professional

Explanations:

- Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered
- Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense
- Small Disturbed Sample
- ⊥ Large Disturbed Sample
- U100 Undisturbed Sample

- ▼ Scala Penetrometer - blows/50mm
- ⊥ Permeability Test
- ▼ Schmidt Hammer
- ▼ Insitu Vane Shear Strength (kPa)
- V=Peak, R=Residual, UTP=Unable to penetrate
- ⬇ Water Strike (1st, 2nd...)
- ⬆ Water Rise (1st, 2nd...)
- ⬇ Rise Time (minutes)

GROUNDWATER

- None
- Slow Seep (depth 2.8, 1.5 m)
- Rapid Inflow (depth)

HOLE TERMINATED DUE TO:
Refusal

Remarks

Groundwater was encountered at the depth of 1.5m, dated 12/11/2018

All dimensions in metres Scale 1:41	Shear Vane No. 1706	Logged by: RTS	Checked by: <i>[Signature]</i>
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HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.: HA12
Job No.: 180432	Start Date: 11-10-18 Finish Date: 11-10-18	Ground Level (m):		Co-Ordinates ():		
Client: Wainono Investment Ltd			Hole Depth: 4.25 m			Sheet: 1 of 1

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)				Groundwater	Soil Moisture	Samples	Tests	
					50	100	150	200	3	6	9	12					15
	0.45	Topsoil	TOPSOIL.														
	0.90	Puketoka Formation	Clayey SILT, yellowish grey. Very stiff, moderately plastic [PUKETOKA FORMATION].										WS			✓ V= 122 R= 63	
	1		Silty CLAY, trace sand; light brownish yellow with orange mottles and white specks. Very stiff, moderately plastic; sand, fine.										S			✓ V= 139 R= 14	
	2															✓ V= 139 R= 57	
	2.50															✓ V= 114 R= 43	
	3		Organic CLAY, some silt, dark grey and black mixed. Stiff, highly plastic.													✓ V= 80 R= 45	
	4		3.80 m Grades to 100mm of fine sand layer.													✓ V= 57 R= 26	
	4.25		4.10 m Grades to trace pumiceous fine gravel.													✓ V= 57 R= 23	
	5		EOH @ 4.25 m													✓ UTP	
	6																
	7																

RILEY\AKL_GLB Log RILEY HA (AKL) NO MAP 180432-BOREHOLE LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense ● Small Disturbed Sample Large Disturbed Sample ■ U100 Undisturbed Sample	▾ Scala Penetrometer - blows/50mm ⊕ Permeability Test ▾ Schmidt Hammer ▾ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ▾ Water Strike (1st, 2nd ...) ▾ Water Rise (1st, 2nd ...) and ▾ Rise Time (minutes)	GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 1.0 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Refusal	Remarks

HAND AUGER LOG

Project: 21 Gatland Road		Location: Papakura		Hole position: Refer to site plan.		No.:	
Job No.: 180432		Start Date: 11-10-18 Finish Date: 11-10-18		Ground Level (m):		HA13	
Client: Wainono Investment Ltd				Hole Depth: 5.05 m		Sheet: 1 of 1	

Elevation (m)	Depth (m)	Geological Unit	Geological Description <small>(refer to separate Geotechnical and Geological Information sheet for further information)</small>	Legend	Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)					Groundwater	Soil Moisture	Samples	Tests
						50	100	150	200	3	6	9	12	15				
	0.35	Topsoil	TOPSOIL; dark brown.															
	1	Puketokā Formation	Silty CLAY; light grey with minor orange mottles. Very stiff, moderately plastic [PUKETOKA FORMATION].															✓ V= 105 R= 6
	1.50		CLAY, some silt; light grey with minor orange mottles, very stiff, moderately to highly plastic.															
	2																	✓ V= 154 R= 77
	2.45																	✓ V= 141 R= 22
	3		Organic CLAY, minor silt; dark. Stiff to firm, moderately to highly plastic; organics, amorphous. 2.60 m Grades to dark grey.															✓ V= 49 R= 15
	3.80																	✓ V= 34 R= 15
	4		SILT, trace clay, trace sand; light grey. Very stiff, non plastic; sand, fine; dilatant behaviour. 4.00 m - 4.20 m Wood pieces.															✓ V= 86 R= 9
	4.50																	✓ V= 114 R= 46
	5.05		Organic SILT, minor clay; dark brown. Stiff, slightly plastic; organics, amorphous and fibrous mixed.															✓ V= 77 R= 15
	5.05		EOH @ 5.05 m															✓ V= 92 R= 18

RILEYAKL_GLB_Log_RILEY_HA [AKL] NO MAP 180432-BOREHOLE LOGS.GPJ <<DrawingFile>> 11/12/2018 16:05 Produced by gINT Professional

Explanations:

- Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered
- Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense
- Small Disturbed Sample
- ⊥ Large Disturbed Sample
- U100 Undisturbed Sample

- ▼ Scala Penetrometer - blows/50mm
- ⊥ Permeability Test
- ▼ Schmidt Hammer
- ✓ Insitu Vane Shear Strength (kPa)
V=Peak, R=Residual, UTP=Unable to penetrate
- ⊥ Water Strike (1st, 2nd ...)
- ⊥ Water Rise (1st, 2nd ...) and Rise Time (minutes)

GROUNDWATER

None

Slow Seep (depth 0.4 m)

Rapid Inflow (depth)

HOLE TERMINATED DUE TO:
Target Depth

Remarks

All dimensions in metres Scale 1:41	Shear Vane No. 608	Logged by: GB	Checked by: <i>[Signature]</i>
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HAND AUGER LOG

Project: 21 Gattland Road		Location: Papakura		Hole position: Middle of Lot 9		No.: HA14
Job No.: 180432	Start Date: 11-10-18 Finish Date: 11-10-18	Ground Level (m):		Co-Ordinates ():		
Client: Wainono Investment Ltd			Hole Depth: 5.00 m			Sheet: 1 of 1

RILEYAKL_GLB_10g_RILEY_HA(ANK)_NO_MAP_180432-BOREHOLE LOGS.GPJ <<DrawingFile>> 13/12/2018 12:07 Produced by gINT Professional

Elevation (m)	Depth (m)	Geological Unit	Geological Description (refer to separate Geotechnical and Geological Information sheet for further information)	Legend Unified Symbol	Soil Shear Strength (kPa)				Scala Penetrometer (blows / 50 mm)					Groundwater	Soil Moisture	Samples	Tests
					50	100	150	200	3	6	9	12	15				
	0.70	Alluvium	SILT, minor clay; dark brown with trace dark orange mottles. stiff to very stiff, slightly plastic [ALLUVIUM].	X													✓ V= 151 R= 6
	1.15		Organic SILT, minor clay; dark grey with trace dark orange mottles. Very stiff, non to slightly plastic.	X													✓ V= 105 R= 9
	2		Silty CLAY, trace sand; orange and light grey mixed. Very stiff, moderately plastic; sand, fine; pumiceous [PUKETOKA FORMATION].	X													✓ V= 120 R= 62
	3			X													✓ V= 105 R= 49
	3.50	Puketoka Formation		X													✓ V= 92 R= 52
	4		Organic CLAY, trace sand; dark brown. Stiff, highly plastic; sand, fine.	X													✓ V= 108 R= 62
	4.90		4.00 m Grades to firm.	X													✓ V= 49 R= 15
	5.00			X													✓ V= 37 R= 22
	6		SILT, some sand, trace organics; light grey with trace dark brown lamination. Very stiff, non plastic; sand, fine; organics, amorphous.	X													✓ V= 77 R= 43
	7		EOH @ 5.00 m	X													✓ V= 215+

Explanations: Rock Mass Weathering - unweathered, slightly weathered, moderately weathered, highly weathered, completely weathered, residually weathered Relative soil Strength - very soft/very loose, soft/loose, firm/medium dense, stiff/dense, very stiff/very dense • Small Disturbed Sample ↓ Large Disturbed Sample ■ U100 Undisturbed Sample		▼ Scala Penetrometer - blows/50mm ↓ Permeability Test ▾ Schmidt Hammer ✓ Insitu Vane Shear Strength (kPa) V=Peak, R=Residual, UTP=Unable to penetrate ↓ Water Strike (1st, 2nd ...) ↓ Water Rise (1st, 2nd ...) and ▽ Rise Time (minutes)		GROUNDWATER <input type="checkbox"/> None <input checked="" type="checkbox"/> Slow Seep (depth 0.5 m) <input type="checkbox"/> Rapid Inflow (depth) HOLE TERMINATED DUE TO: Target Depth		Remarks 		
All dimensions in metres Scale 1:41			Shear Vane No. 608		Logged by: GB		Checked by: ASD	

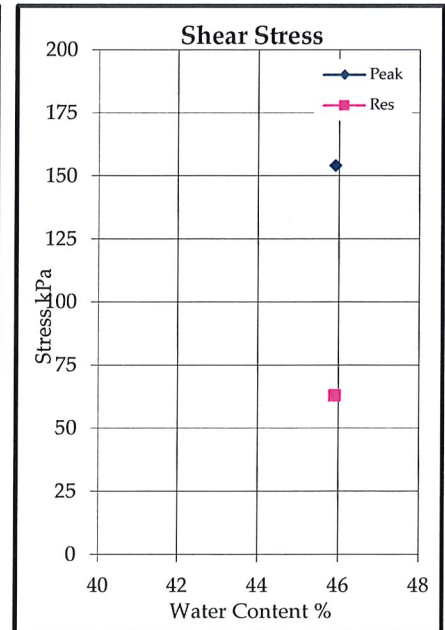
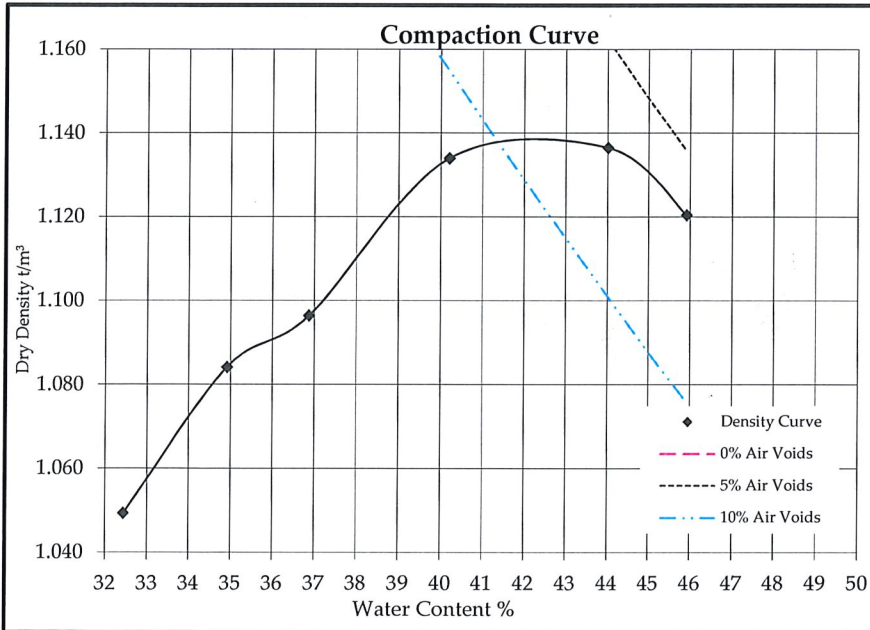
**DRY DENSITY / WATER CONTENT RELATIONSHIP
STANDARD COMPACTION**



Project : **21 Gatland Road**
 Location : **21 Gatland Road**
 Client : **Riley Consultants Ltd.**
 Contractor : **Riley Consultants Ltd.**
 Sampled by : **-**
 Date sampled : **15/10/18**
 Sampling method : **Not Stated**
 Sample description : **Silty CLAY; Brown; Moist, Plastic**
 Sample condition : **As Received**
 Solid density : **2.65 t/m³ (Assumed)**
 Source: **21 Gatland Road**

Project No : **1-LA014.00**
 Lab Ref No : **AL3257/1**
 Client Ref No : **180432**

Test Results							
Maximum dry density	1.14	t/m ³	Natural water content	44.0	%		
Optimum water content	42	%	Fraction tested	Whole			
Sample ID	A	B	C	D	Nat	E	
Bulk density	t/m ³	1.390	1.463	1.501	1.590	1.637	1.635
Water content	%	32.4	34.9	36.9	40.2	44.0	45.9
Dry density	t/m ³	1.049	1.084	1.096	1.134	1.136	1.120
Sample condition		Dry	Dry	Moist	Moist	Moist	Moist
Peak stress	kPa	UTP	UTP	UTP	UTP	140+	154
Remoulded stress	kPa	UTP	UTP	UTP	UTP	-	63



Test Methods	Notes
Compaction NZS 4402 : 1986 Test 4.1.1 (Standard)	
Shear Strength using a Hand Held Shear Vane, NZ Geotechnical Soc Inc 8/2001	

Date tested : 08-13/11/18
 Date reported : 19/11/18

Sampling is not covered by IANZ Accreditation. Results apply only to sample tested.
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IANZ Approved Signatory
 Ben Richardson 
 Designation : Assistant Laboratory Manager
 Date : 20/11/18



All tests reported herein have been performed in accordance with the laboratory's scope of accreditation

**CALIFORNIA BEARING RATIO (REMOULDED)
TEST REPORT**



Project: 21 Gatland Road
 Location: 21 Gatland Road
 Client: Riley Consultants Ltd.
 Contractor: Riley Consultants Ltd.
 Sampled by: Not Stated

Date sampled: 15/10/18
 Sampling method: Not Stated
 Sample condition: As Received
 Sample description: Silty CLAY, Brown, Moist, Plastic*
 Date sample/s received: 16/10/18

Project No: 1-LA014.00
 Lab Ref No: AL3257/2-4
 Client Ref No: -

Test Results															
Lab Ref No.	Location	Sample condition at test	Curing time (Days)	Soaking time (Days)	Passing 19mm (%)	Surcharge mass (kg)	Lime additive (%)	Cement additive (%)	Swell (%)	Penetration (mm)	Water content as received (%)	Water content as compacted (%)	Water content after testing (%)	Dry density (t/m ³)	CBR value (%)
AL3257/2	21 Gatland Road	Soaked	0	4	100	4	0	0	0.2	2.5	44.3	44.3	46.2	1.12	9
	Soaked														
AL3257/3	21 Gatland Road	Soaked	3	4	100	4	2	0	0.2	2.5	44.3	43.1	46.2	1.10	11
	Soaked														
AL3257/4	21 Gatland Road	Soaked	3	4	100	4	4	0	0	2.5	44.3	41.7	45.2	1.10	14
	Soaked														

Test Methods	Notes
CBR	NZS : 4402 : 1986 : 6.1.1
Water Content	Material Used: Passing 19mm sieve Rate of penetration : 1mm/min
Compaction	NZS : 4402 : 1986 : 2.1 *Sample Description is not covered by IANZ Accreditation

Sampling is not covered by IANZ Accreditation. Results apply only to sample tested.
 This report may only be reproduced in full

IANZ Approved Signatory
Ben Richardson
 Ben Richardson
 Assistant Laboratory Manager
 Designation :
 Date : 20/11/18



Tests indicated as not accredited are outside the scope of the laboratory's accreditation

Date tested: 12-15/11/18
 Date reported: 20/11/18

LAB-021 (19/03/2018)

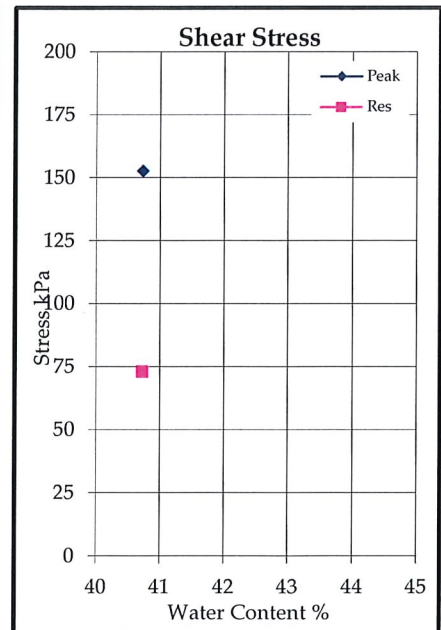
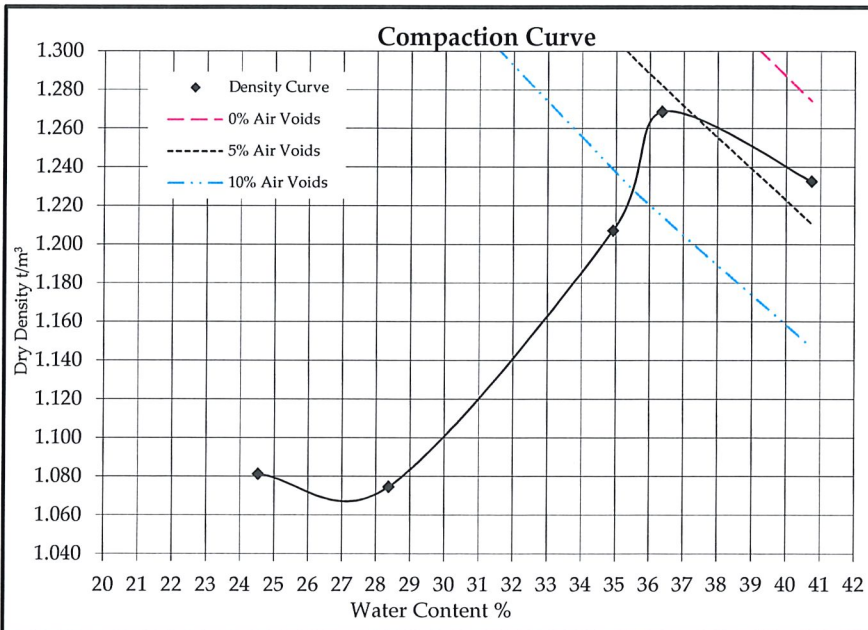
**DRY DENSITY / WATER CONTENT RELATIONSHIP
STANDARD COMPACTION**



Project : **21 Gatland Road**
 Location : **TP2**
 Client : **Riley Consultants Ltd**
 Contractor : **Riley Consultants Ltd**
 Sampled by : **Not Stated**
 Date sampled : **Not Stated**
 Sampling method : **Not Stated**
 Sample description : **Silty CLAY; Brown; Moist, Plastic**
 Sample condition : **As Received**
 Solid density : **2.65 t/m³ (Assumed)**
 Source: **21 Gatland Road**

Project No : **1-LA014.00**
 Lab Ref No : **AL3328/1**
 Client Ref No : **180432**

Test Results							
Maximum dry density	1.27	t/m ³	Natural water content	40.7	%		
Optimum water content	36	%	Fraction tested	Whole Sample			
Sample ID	A	B	C	D	Nat		
Bulk density t/m ³	1.346	1.379	1.629	1.730	1.735		
Water content %	24.5	28.4	34.9	36.3	40.7		
Dry density t/m ³	1.081	1.075	1.207	1.269	1.233		
Sample condition	Dry	Moist-Dry	Moist	Moist	Moist		
Peak stress kPa	UTP	UTP	UTP	UTP	153		
Remoulded stress kPa	UTP	UTP	UTP	UTP	73		



Test Methods	Notes
Compaction NZS 4402 : 1986 Test 4.1.1 (Standard)	%Air voids lines are not covered by IANZ accreditation due to the solid density being assumed.
Shear Strength using a Hand Held Shear Vane, NZ Geotechnical Soc Inc 8/2001	

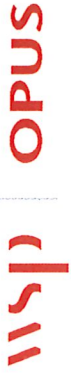
Date tested : 28/11/18 - 07/12/18 Sampling is not covered by IANZ Accreditation. Results apply only to sample tested.
 Date reported : 10/12/18 This report may only be reproduced in full

IANZ Approved Signatory
 Ben Richardson 
 Designation : Assistant Laboratory Manager
 Date : 10/12/18



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**CALIFORNIA BEARING RATIO (REMOULDED)
TEST REPORT**



Project: 21 Gatland Road
Location: TP2
Client: Riley Consultants Ltd.
Contractor: Riley Consultants Ltd.
Sampled by: Not Stated

Date sampled: Not Stated
Sampling method: Not Stated
Sample condition: As Received
Sample description: Silty CLAY; Brown; Moist, Plastic
Date sample/s received: 22/11/18

Project No: 1-LA0014.00
Lab Ref No: AL3328/2-4
Client Ref No: 180432

Test Results

Lab Ref No.	Sample condition at test	Curing time (Days)	Soaking time (Days)	Passing 19mm (%)	Surcharge mass (kg)	Lime additive (%)	Cement additive (%)	Swell (%)	Penetration (mm)	Water content as received (%)	Water content as compacted (%)	Water content after testing (%)	Dry density (t/m ³)	CBR value (%)
AL3328/2	Location Soaked	TP2 0	5	100	4	0	0	0	5	41.3	41.3	41.5	1.22	3
AL3328/3	Location Soaked	TP2 3	4	100	4	2	0	0	2.5	41.3	40.4	40.6	1.22	11
AL3328/4	Location Soaked	TP2 3	4	100	4	4	0	0	2.5	41.3	39.0	37.2	1.22	40

Test Methods	Notes
CBR	NZS : 4402 : 1986 : 6.1.1
Water Content	Material Used: Passing 19mm sieve
Compaction	Rate of penetration : 1mm/min

Sampling is not covered by IANZ Accreditation. Results apply only to sample tested.
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IANZ Approved Signatory
Ben Richardson
 Assistant Laboratory Manager
 10/12/18



Tests indicated as not accredited are outside the scope of the laboratory's accreditation

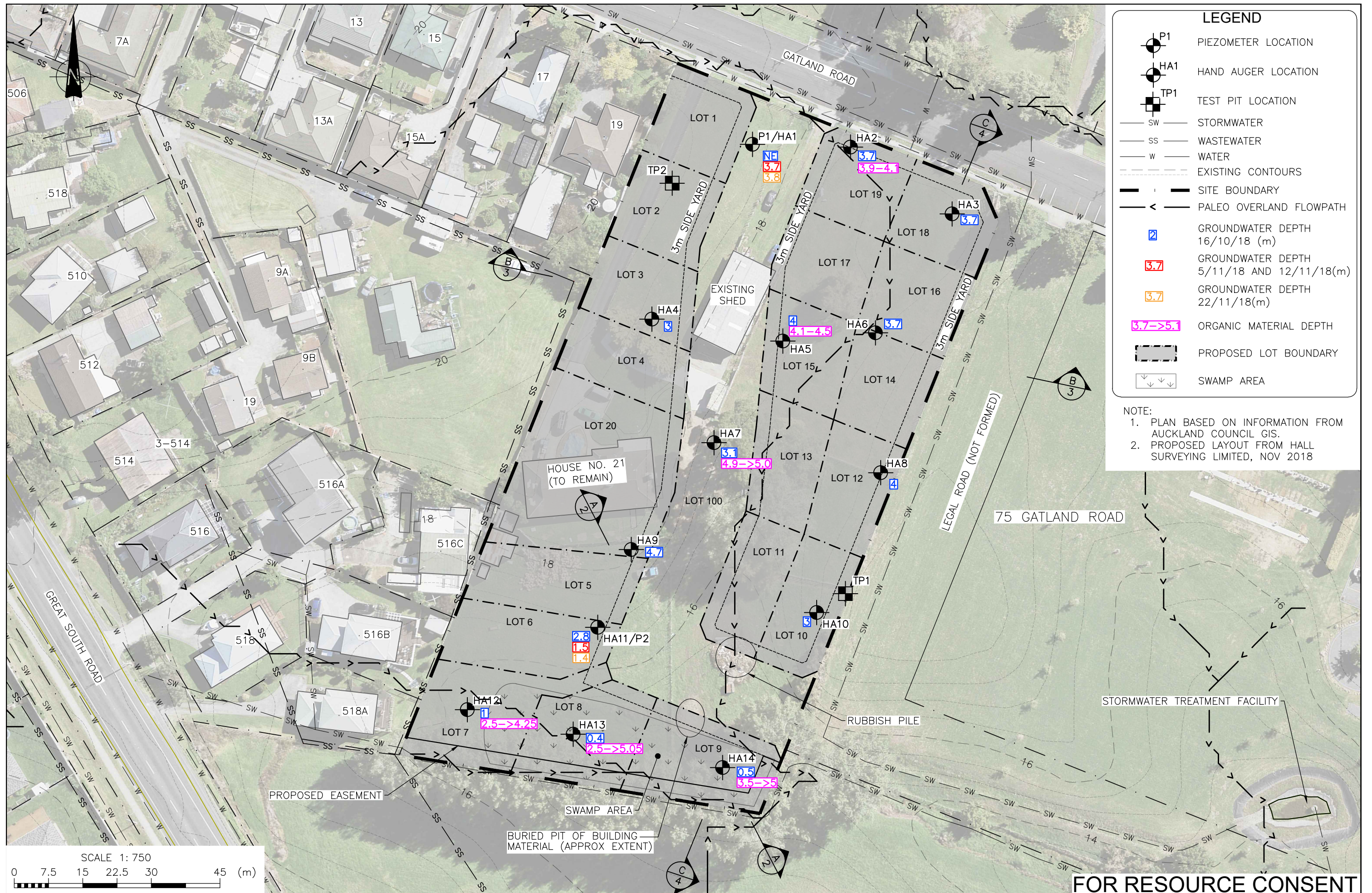
Date tested: 02-05/12/18
Date reported: 10/12/18

PF-LAB-021 (19/03/2018)

WSP Opus
 Auckland Laboratory
 Quality Management Systems Certified to ISO 9001

7A Ride Way, Albany
 Private Bag 101982, NS Mail Centre, North
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Telephone +64 9 415 4660
 Website www.wsp-opus.co.nz



1	FIRST ISSUE	WY 21.12.18	DATE DRAWN NOV 2018
REV	DESCRIPTION	BY	DATE

DESIGN MJ	CHECKED MJ
DRAWN WY	CHECKED JM

APPROVED FOR ISSUE:	B BLACK
DATE:	21/12/18

RILEY CONSULTANTS

P.O. BOX 100 253
NORTH SHORE
AUCKLAND 0745
TEL. 09-4897872
FAX. 09-4897873

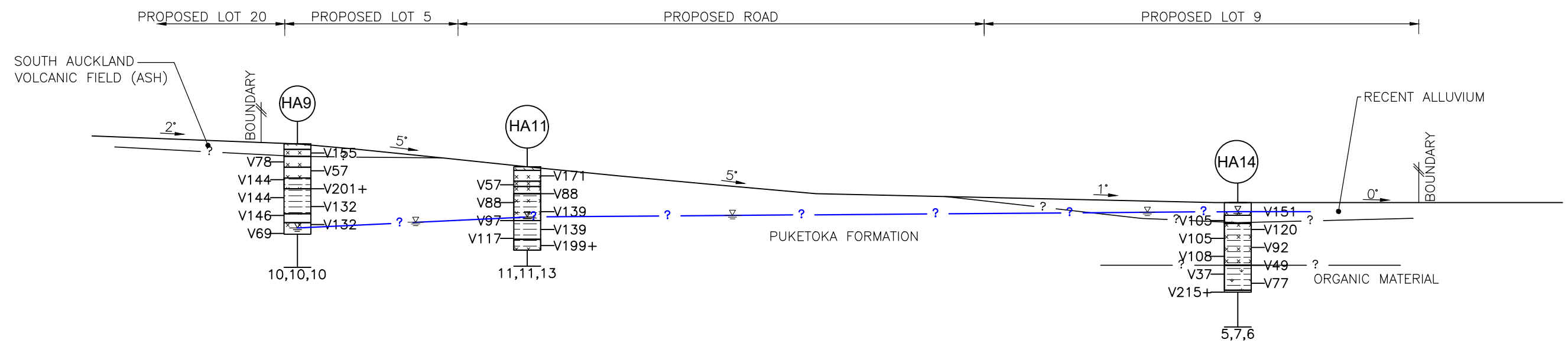
TITLE

WAINONO INVESTMENT LTD
21 GATLAND ROAD, DRURY
GEOTECHNICAL INVESTIGATION - PROPOSED SITE PLAN

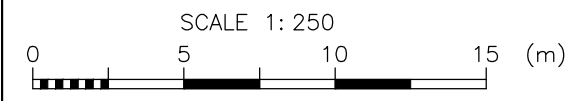
CADFILE 180432-1	DRAWING No. 180432	REV. 1
SCALES (A3) 1:750	249	

LEGEND

- HA1 HAND AUGER LOCATION
- FILL
- CLAY
- ORGANICS
- SILT
- SAND
- v188+ INSITU UNDRAINED SHEAR STRENGTHS (kPa)
- SCALA PENETROMETER FROM BASE OF BOREHOLE (6,7,7)
- WL GROUNDWATER LEVEL (16/10/18)
- 10° EXISTING GROUND SLOPE



SECTION A
SCALE 1:250

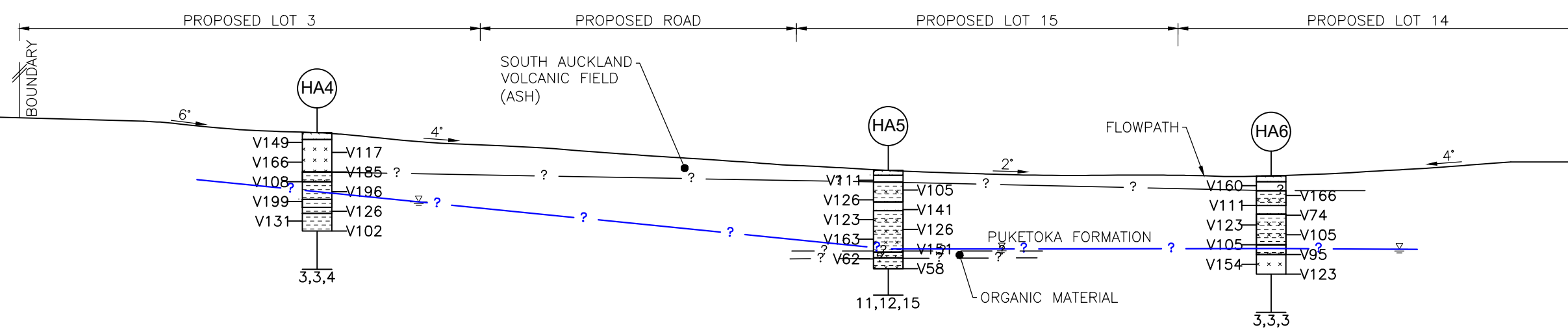


FOR RESOURCE CONSENT

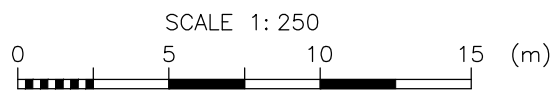
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DRAWN RTS		CHECKED JM		B BLACK			P.O. BOX 100 253 NORTH SHORE AUCKLAND 0745 TEL. 09-4897872 FAX. 09-4897873		GEOTECHNICAL INVESTIGATION CROSS SECTION A		SCALES (A3) 1:250		
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REV	DESCRIPTION	BY	DATE									250	

LEGEND

- HA1 HAND AUGER LOCATION
- FILL
- CLAY
- ORGANICS
- SILT
- SAND
- v188+ INSITU UNDRAINED SHEAR STRENGTHS (kPa)
- SCALA PENETROMETER FROM BASE OF BOREHOLE (6,7,7) (blows/50mm for last 150mm)
- WL GROUNDWATER LEVEL (16/10/18)
- 10° EXISTING GROUND SLOPE



SECTION B
SCALE 1:250

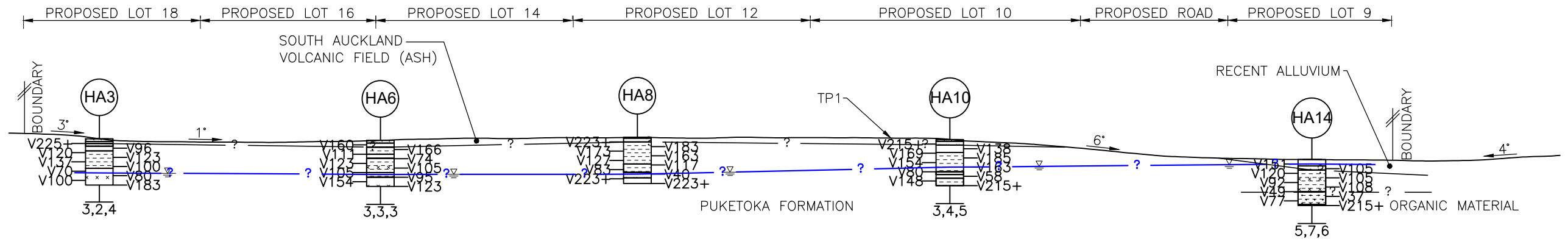


FOR RESOURCE CONSENT

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DATE DRAWN NOV 2018		DATE 21/12/18		DATE: 21/12/18						DRAWING No. 180432-3		REV. 1
1	FIRST ISSUE	WY	21.12.18	BY	DATE							251

LEGEND

- HA1 HAND AUGER LOCATION
- FILL
- CLAY
- ORGANICS
- SILT
- SAND
- v188+ INSITU UNDRAINED SHEAR STRENGTHS (kPa)
- SCALA PENETROMETER FROM BASE OF BOREHOLE (6,7,7) (blows/50mm for last 150mm)
- WL GROUNDWATER LEVEL (16/10/18)
- 10° EXISTING GROUND SLOPE



SECTION C
SCALE 1:500



FOR RESOURCE CONSENT

DESIGN MJ		CHECKED MJ		APPROVED FOR ISSUE:				WAINONO INVESTMENT LTD 21 GATLAND ROAD, DRURY GEOTECHNICAL INVESTIGATION CROSS SECTION C		CADFILE 180432-3to4	
DRAWN RTS		CHECKED JM		B BLACK						SCALES (A3) 1:500	
DATE DRAWN NOV 2018		DATE: 21/12/18		P.O. BOX 100 253 NORTH SHORE AUCKLAND 0745 TEL. 09-4897872 FAX. 09-4897873		DRAWING No. 180432-4		REV. 1		ACENZ	
1	FIRST ISSUE	WY 21.12.18	DATE DRAWN NOV 2018	DATE: 21/12/18						252	
REV	DESCRIPTION	BY	DATE								

APPENDIX 5
SPECIALIST ASSESSMENTS



**Proposed Plan Change 52:
520 Great South Road**

Transportation Hearing
Report

November 2020



flow

TRANSPORTATION SPECIALISTS

255

Project: Proposed Plan Change 52: 520 Great South Road
Title: Transportation Hearing Report
Document Reference: P:\ACXX\402 520 Great South Road, Drury, Private Plan Change\Reporting\R1C210413 - Hearing report.docx
Prepared by: Mat Collins
Reviewed by: Bronwyn Coomer-Smit

Revisions:

Date	Status	Reference	Approved by	Initials
22 October 2020	Draft for Council comment	R1A201022	B Coomer-Smit	
20 November 2020	Updated for further submissions	R1B201120	M Collins	
13 April 2021	Update for Local Board comments	R1C210413		

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SUMMARY OF MY PEER REVIEW

Auckland Council (Council) has requested Flow Transportation Specialists (Flow) to review the transportation matters associated with a Private Plan Change (PPC52) lodged by 520 Great South Road Limited (applicant). PPC52 seeks to rezone approximately 4.6 hectares of Future Urban Zoned land at 520 - 522 Great South Road and 21 Gatland Road, Drury, to Residential – Mixed Housing Urban Zone.

Key transport matters raised during my review

- ◆ Delivery of the transport improvements to support PPC52
- ◆ Sightline shortfall at Great South Road / Gatland Road intersection
- ◆ Pedestrian connectivity
- ◆ Widening of Great South Road
- ◆ Future proofing connectivity to surrounding land

I recommend that

- ◆ Council's Reporting Planner consider whether the regionwide provisions of the Unitary Plan are robust enough to ensure the cumulative transport effects of PPC52 can be appropriately assessed and managed/mitigated should site-by-site resource consent applications be received. Refer to Section 3.1 of this report, and Submission 13
- ◆ Sufficient safe intersection site distance is achieved at the intersection of Gatland Road and Great South Road prior to development of land in the PPC52 Site fronting Gatland Road, or any new road connection to Gatland Road. Refer to Section 3.2 of this report
- ◆ A pedestrian crossing facility is provided on Great South Road, near Road 1, and that a footpath is provided along the entire Site frontage with Great South Road prior to development of land fronting Great South Road, or any new road connection to Great South Road. Refer to Section 3.3 of this report
- ◆ The applicant vests sufficient frontage on Great South Road to provide a right turn bay and compliant berm along the PPC52 Site frontage, and provide a 5.0 m development setback from the existing road boundary to allow future widening of the Great South Road corridor. Refer to Section 3.4 of this report
- ◆ That transport connectivity to Future Urban Zoned land to the south/east of the PPC52 Site is provided as part of future subdivision. Refer to Section 3.5 of this report
- ◆ That the intersection of Road 1 with Great South Road is designed to integrate with the consented vehicle crossing for 541 Great South Road. Refer to my response to Submission 11 in Section 4 of this report
- ◆ That a pedestrian crossing on Great South Road, north of Slippery Creek Bridge, be provided by Auckland Transport. Refer to my response to Submission 14 in Section 4 of this report.

I recommend that Council's Reporting Planner consider the following submission points (refer to Section 4 for further detail)

- ◆ Traffic noise effects, refer to Submission 2, 3 and 6
- ◆ Flooding effects on Gatland Road, refer to Submission 5 and 6
- ◆ Existing traffic effects on Gatland Road related to activity at the cemetery, refer to Submission 7
- ◆ Whether the Section 32 report adequately addresses development out of sequence with FULSS, refer to Submission 13
- ◆ Whether the alignment of Road 1, between Great South Road and Gatland Road, should be established as part of PPC52, refer to Submission 13.

Should my recommendations be accepted, and the mitigations identified in the ITA be implemented as part of future subdivision/land use consents for the Site, I consider that PPC52 can be approved and that with the mitigation outlined above will support a safe and efficient transport network.

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3.2	Sightline shortfall at Great South Road / Gatland Road intersection	6
3.3	Pedestrian connectivity	7
3.4	Widening of Great South Road	7
3.5	Future proofing connectivity to surrounding land	8
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APPENDICES

APPENDIX A CLAUSE 23 REQUEST SUMMARY

1 INTRODUCTION

Auckland Council (Council) has requested Flow Transportation Specialists (Flow) to review the transportation matters associated with a proposed Private Plan Change (PPC52) lodged by 520 Great South Road Limited (applicant). The PPC52 seeks to rezone approximately 4.6 hectares of Future Urban Zoned land at 520 - 522 Great South Road and 21 Gatland Road, Drury (Site), to Residential – Mixed Housing Urban Zone.

The scope of this specialist transport report is to assist Council in determining the transport outcomes of PPC52 and includes the following.

- ◆ A summary of PPC52 focusing on transport matters
- ◆ A review of the material provided to support the PPC52 application
- ◆ Summary of submissions, relating to transport matters only
- ◆ Our recommendations.

I have reviewed the following documents

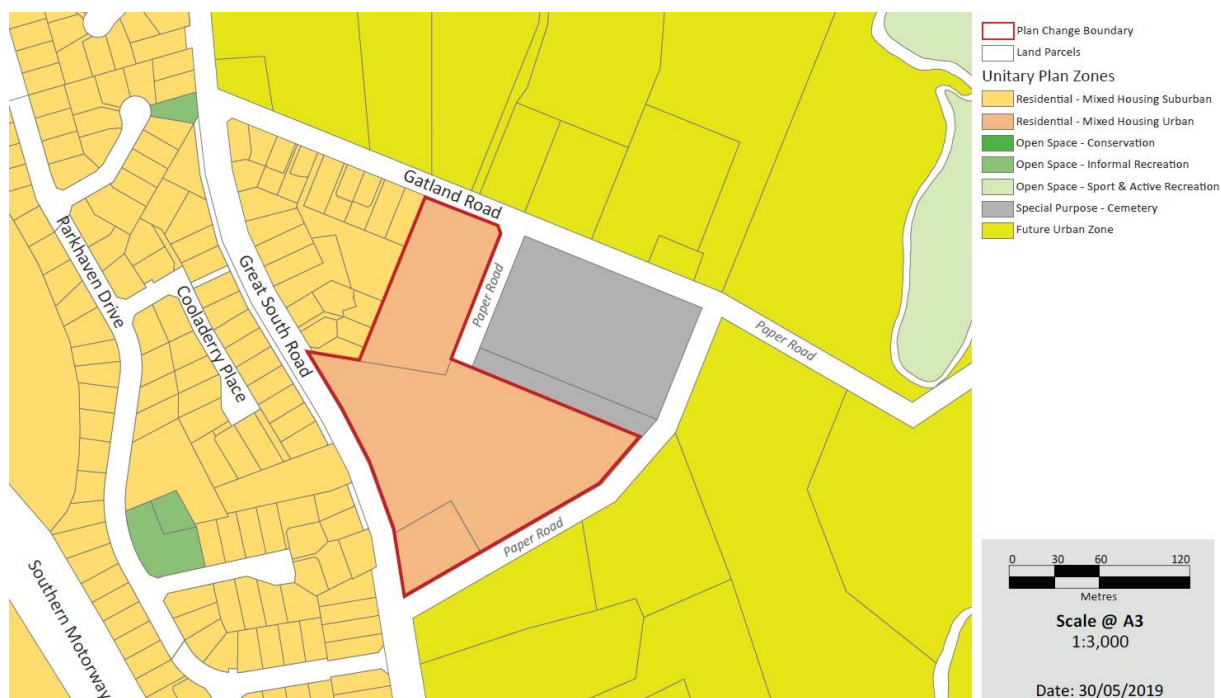
- ◆ Section 32 Assessment Report, prepared by Barkers and Associates (B&A), dated February 2020, including
 - Appendix 4 Regional Policy Statement Objectives and Policies assessment
 - Appendix 5 Urban Design Statement
 - Appendix 6 Transport Assessment (TA)
- ◆ Clause 23 responses, received from B&A on 25 May 2020 including
 - RFI transport response, from TPC dated 14 May 2020
- ◆ Clause 23 responses, received from B&A on 16 June 2020
- ◆ Section 32 Assessment Report, prepared by B&A, dated May 2020, as notified
- ◆ Submissions and further submissions, as outlined in Section 4.

2 THE PPC52 PROPOSAL

The applicant is applying to rezone 4.6 hectares of Future Urban Zone (FUZ) land to Residential – Mixed Housing Urban Zone, as shown in Figure 1. The Section 32 report estimates that the Site will be able to accommodate approximately 110 dwellings.

No Precinct is proposed, therefore the assessment of transport effects of future development within PPC52 will rely on the regionwide provisions of the Auckland Unitary Plan.

Figure 1: PPC area and proposed zoning



3 MY REVIEW OF TRANSPORT MATTERS

A summary of all the transportation matters raised throughout my review, including Clause 23 information requests, is contained in Appendix A. The following subsections summarise the key transport matters raised during my review. My position is provided for each transport matter.

3.1 Delivery of the transport improvements to support PPC52

I consider that the transport improvements suggested by the applicant in the TA are acceptable, however I had concerns about whether these improvements would be secured through a future resource consent(s).

I consider it possible that, once the Site is rezoned, Council could be faced with a situation where individual consents are sought, each of which are considered a Permitted activity, but that cumulatively trigger the need for mitigation measures identified within the TA but cannot be required to be implemented by the applicant under the Auckland-wide rules of the AUP (i.e. if E27.6.1. Trip Generation is not triggered). This is particularly relevant for those measures that are not immediately adjacent to the property boundary.

Improvements that I consider are required to mitigate transport effects of PPC52 include

- ◆ addressing the sight line shortfall at Gatland Road/Great South Road
- ◆ providing connectivity to the existing pedestrian network, and providing a footpath along the site frontage
- ◆ providing widening of Great South Road to accommodate the Road 1 intersection and compliant berm.

In my opinion the delivery of these mitigation measures anticipated in the TA, particularly those not adjacent to the development, should ideally be secured through a sound framework which ensures a safe and efficient outcome for all users, Auckland Transport and Auckland Council. I consider that such a framework may include a Precinct which captures the required mitigations. However, I note that Chapter E27, Chapter E38, and Chapter H5 all contain provisions regarding the management of traffic effects.

I recommend that Council's Planner consider whether the regionwide provisions of the Unitary Plan are robust enough to ensure the cumulative transport effects of PPC52 can be appropriately assessed and mitigated through the implementation of the above transport infrastructure, should site-by-site resource consent applications be received.

3.2 Sightline shortfall at Great South Road / Gatland Road intersection

The TA identified that the existing intersection of Great South Road and Gatland Road has restricted visibility for drivers to the south. As shown in Figure 2, there is approximately only 70 m of sight distance available to drivers egressing Gatland Road

Figure 2: Gatland Road intersection with Great South Road, looking south



Using Equation 2 from Austroads Guide to Road Design Part 3, shown below, the required safe intersection site distance is approximately 150 m. As such the available sight distance less than half of what is required.

$$SISD = D_T * \frac{V}{3.6} + \frac{V^2}{254 * (d + 0.01a)}$$
$$SISD = 5sec * \frac{75 \frac{km}{hr}}{3.6} + \frac{(75 \frac{km}{hr})^2}{254 * (0.46 + 0.01 * 1\%)}$$
$$SISD = approx 150m$$

As part of my Clause 23 review, I highlighted safety concerns with this significant shortfall in sight distance, as PPC52 will likely result in additional traffic movements through this intersection, therefore increasing the likelihood of crashes. I disagree with the conclusion in Section 4.2 of the TA that PPC52 will have minimal effect on the safe operation of this intersection.

I suggested that mitigation measures, such as trimming back vegetation and a reduction in the speed limit on Great South Road, should be investigated. The applicant responded stating that it is working on resolving the sightline issue with Auckland Transport through the resource consent process.

I recommend that sufficient safe intersection site distance is achieved at the intersection of Gatland Road and Great South Road prior to development of land within the PPC52 Site fronting Gatland Road, or any new road connection to Gatland Road.

3.3 Pedestrian connectivity

As part of my Clause 23 review, I noted the discontinuous pedestrian network on the eastern side of Great South Road, and queried how PPC52 would provide for pedestrian movements outside of the Site. The applicant responded that a footpath along the Site's frontage and a pedestrian refuge crossing on Great South Road, near the Road 1 intersection, would be provided as part of a resource consent application for the Site.

I recommend that a pedestrian crossing facility is provided on Great South Road, near Road 1, and that a footpath is provided along the entire Site frontage with Great South Road prior to development of land within the PCC 52 Site fronting Great South Road, or any new road connection to Great South Road.

3.4 Widening of Great South Road

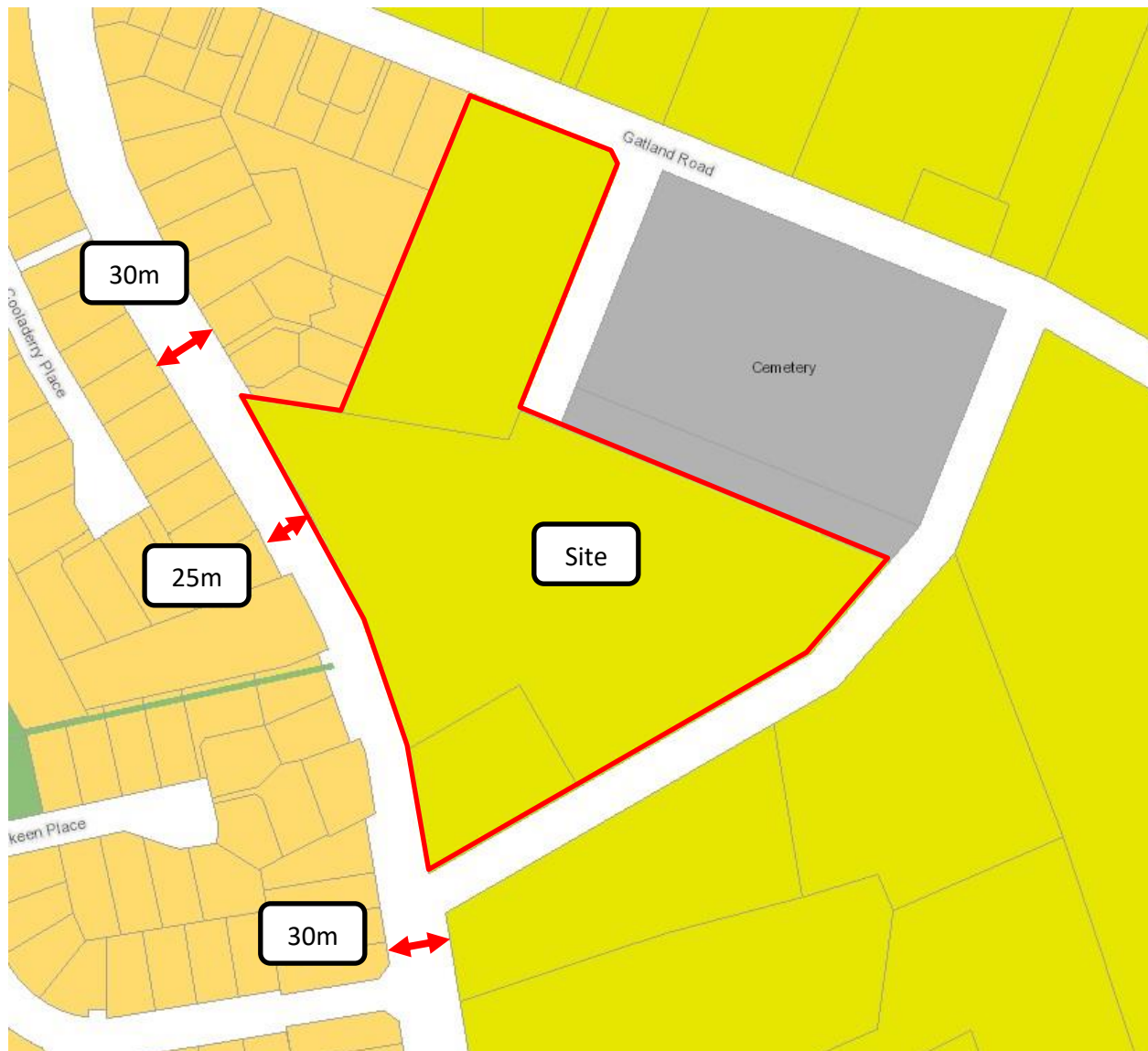
As part of my Clause 23 review, I sought clarification whether vesting of part of the Site frontage with Great South Road was required in order to provide a right turn bay for the Road 1/Great South Road intersection, and to provide sufficient berm space to allow for urbanisation (e.g. footpath, front and rear grass berm, street lighting, kerb and channel).

The applicant responded that a degree of frontage will need to be vested to accommodate the right turn bay and a suitable berm width, and that this would be confirmed as part of future resource consents. Further, the applicant highlighted that a 5.0 m development setback from Great South Road is proposed,

to allow acquisition of this land by Auckland Transport. This would allow a 30 m wide corridor, consistent with the width of Great South Road to the north and south of the site, as shown in Figure 3.

I recommend the applicant vest sufficient frontage on Great South Road and provide a right turn bay and compliant berm along the Site frontage. I recommend that a 5.0m development setback from the existing road boundary is provided to allow future widening of the Great South Road corridor.

Figure 3: Great South Road corridor width



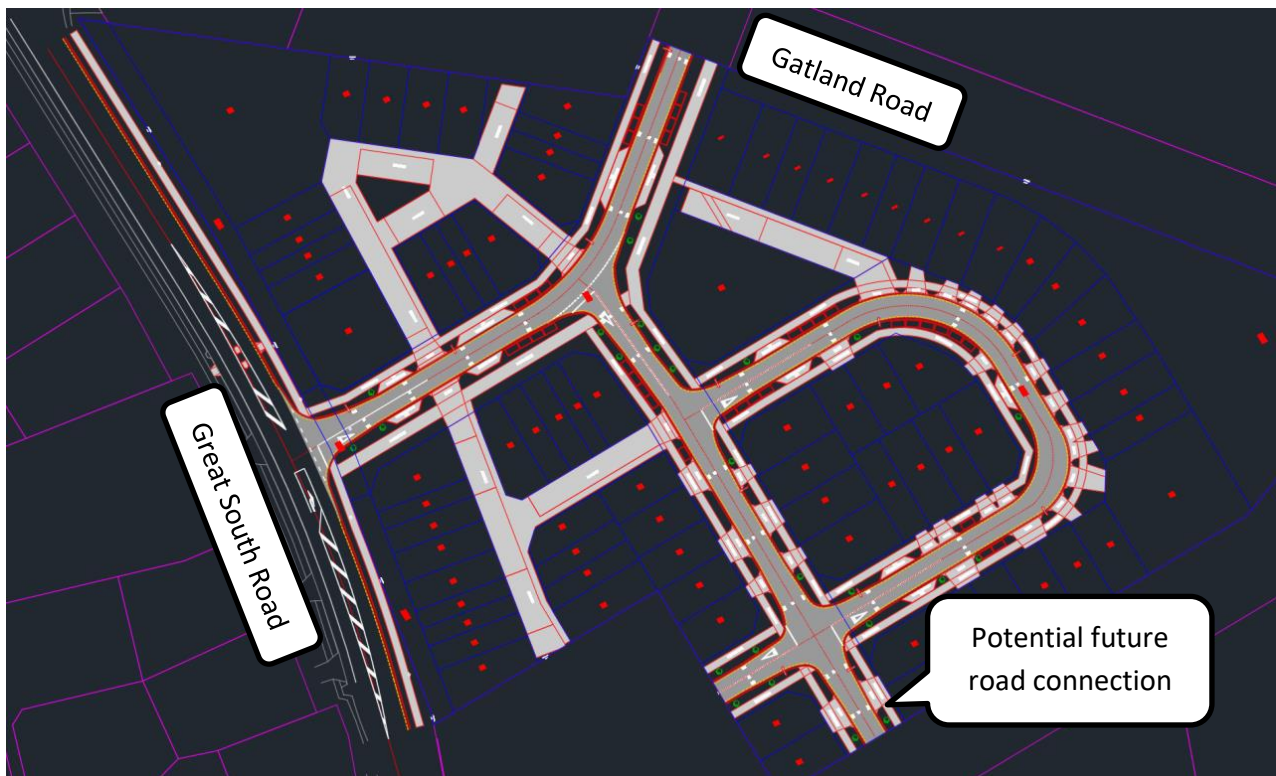
3.5 Future proofing connectivity to surrounding land

During my review of the PPC52 application, I considered that the masterplan for the Site (which can be enabled by OOC52) did not adequately allow for transport connectivity to Future Urban Zoned land to the south/east of the Site. Connectivity of the transport network reduces the reliance on private vehicle transport, increases accessibility, permeability and increases resilience.

The applicant responded that the proposed subdivision plan included a dead-head street which could be extended to adjacent land parcels in the future, as shown in Figure 4.

I recommend that connectivity to Future Urban Zoned land is provided as part of future subdivision, as shown on the proposed subdivision plan provided by the applicant.

Figure 4: Internal street layout for proposed resource consent



4 MY REVIEW OF SUBMISSIONS AND LOCAL BOARD FEEDBACK

4.1 Submissions

Nine submissions related to transport matters were received as follows.

- ◆ Submitter 2 – Casey Norris
- ◆ Submitter 3 – Jamie McKenzie
- ◆ Submitter 4 – Chris Caldwell
- ◆ Submitter 5 - Judy and Peter Coleman
- ◆ Submitter 6 - Priyanka Hulikoppe
- ◆ Submitter 7 – Julia Marr
- ◆ Submitter 11 - Srini Reddy
- ◆ Submitter 13 – Auckland Transport
- ◆ Submitter 14 – David and Sarah Bryant

Two further submissions related to transport matters were received as follows.

- ◆ Further Submitter 1 – Auckland Transport
- ◆ Further Submitter 4 – Wainono Investments Limited

Details of the submissions and my comments are provided in Table 1 (submissions) and in Table 2 (further submissions). I have used the following coding to assist referencing

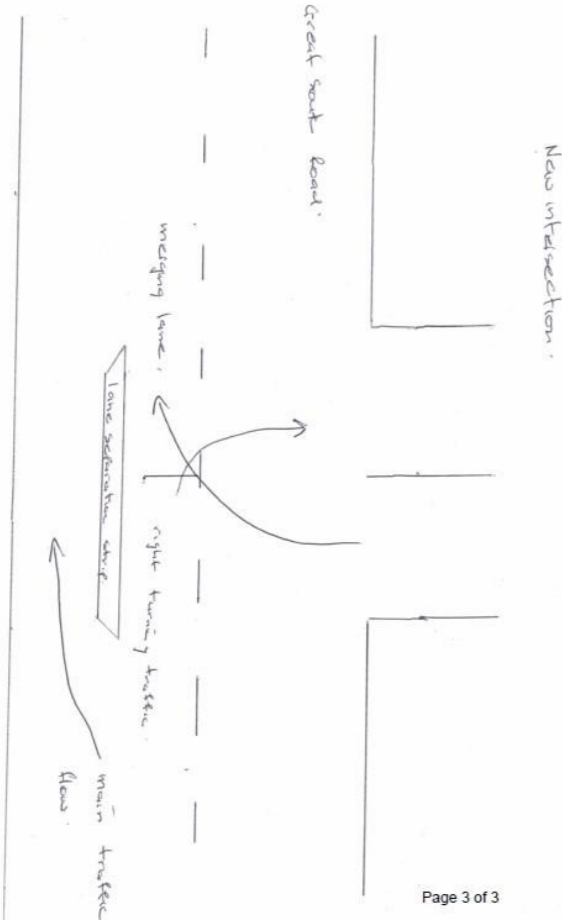
- ♦ **Green** – no action needed unless other submitters request consequential changes
- ♦ **Orange** – I recommend action by Council
- ♦ **Red** – I oppose the decision requested by the submitter

4.2 Local board feedback

Feedback from Papakura Local Board feedback on transport matters, and my comments, are provided in Table 3.

Table 1: Submission summary and commentary

Submitter	Summary of submission point	Flow comment	Status
Submitter 2: Casey Norris Submitter 3: Jamie McKenzie Submitter 5: Judy and Peter Coleman Submitter 6: Priyanka Hulikoppe	PPC52 will affect traffic safety and efficiency.	I consider that the applicant’s TA has adequately assessed the potential transport effects of PPC52. While the submitter may notice some additional vehicle movements on Great South Road resulting from PPC52, in my opinion the overall effect to traffic safety and efficiency will be negligible, provided the improvements identified in the TA and my report are implemented with development.	I do not support the relief sought by the submitter.
Submitter 2: Casey Norris Submitter 3: Jamie McKenzie Submitter 6: Priyanka Hulikoppe	Transport noise effects	Council’s noise expert should consider submission points regarding noise effects	Councils’ noise expert to consider submission points related to noise effects.
Submitter 5: Judy and Peter Coleman Submitter 6: Priyanka Hulikoppe	Concerned about piecemeal development not planned with surrounding development Need for walking and cycling infrastructure.	I support the submitters view that PPC52 should be connected with surrounding land uses, refer to my discussion in Section 3.5 of this report. However, I believe the applicant has adequately addressed connectivity of the transport network. Plans for key future cycleways and walkways are shown on Council’s Drury-Ōpaheke Structure Plan. No routes are shown over PPC52, however Great South Road along the site frontage is show as a “Primary” active modes route. PPC52 does not preclude this route being implemented in the future. The design of new streets within PPC52 will be subject to review as part of future resource consent applications. This will include being subject to Auckland Transport design standards and guidelines, which set expectations around walking and cycling facilities. I consider that this will be sufficient to ensure walking and cycling connectivity within PPC52.	I do not support the relief sought by the submitter.
Submitter 5: Judy and Peter Coleman Submitter 6: Priyanka Hulikoppe	Flooding issues on Gatland Road	The TA supporting PPC52 does not rely on the extension of Gatland Road, all traffic from PPC52 is assumed to route via Great South Road. Council’s stormwater engineer should consider whether the existing section of Gatland Road is subject to flooding and whether this affects PPC52.	Council’s stormwater engineer should consider this submission point
Submitter 6: Priyanka Hulikoppe	Lack of supporting land uses within walking distance Lack of public transport	The applicants’ TA has used industry standard vehicle trip generation rates consistent with the accessibility and development intensity of the site, and has assessed potential transport safety and efficiency effects. I support the conclusions of the TA. Accessibility to public transport, walking and cycling is expected to increase over the longer term, with Great South Road planned to be a key public transport and cycling corridor, per Council’s Drury-Ōpaheke Structure Plan.	I do not support the relief sought by the submitter

<p>Submitter 4: Chris Caldwell</p>	<p>Seeks a right turn lane on Great South Road with raised median as shown below.</p> 	<p>I support the submitters request for measures to improve safety for right turns into and out of Road 1 onto Great South Road, refer to my discussion in Section 3.4 of this report. However, I do not support the intersection arrangement proposed by the submitter. The use of a raised median on Great South Road to separate through movements from right turn movements, as proposed by the submitter, is called a “sea-gull” intersection. While this arrangement can be appropriate in some circumstances, there is growing evidence that this arrangement can be unsafe.</p> <p>I consider that a flush median with a right turn bay, as proposed in the TA, is a more appropriate solution.</p>	<p>I do not support the relief sought by the submitter.</p>
<p>Submitter 7: Julia Marr</p>	<p>Concern about the parking available to residents, seeks to lower the number dwellings and provide more parking.</p> <p>Concerned about the ability for pedestrians to cross Great South Road</p> <p>Questions whether Great South Road will be able to continue as an over-dimension route, and whether future widening will be required.</p> <p>Concerned about traffic effects generated by the cemetery on Gatland Road.</p>	<p>I consider that the provisions of the regionwide rules of the Auckland Unitary Plan are sufficient to ensure appropriate parking provision. Further, I note that the NPS: Urban Development directs Auckland Council to remove any objectives, policies and rules from the Unitary Plan that relate to car parking minimums. Should spill over parking occur, I consider that this can be managed by Auckland Transport through controls and enforcement.</p> <p>I agree with the submitter that PPC52 will generate additional pedestrian crossing demand on Great South Road, as discussed in Section 3.3. I consider that the TA recommendation of a new pedestrian crossing facility on Great South Road, near Road 1, appropriately provides for the additional pedestrian demand.</p> <p>I agree with the submitter, bit consider that future resource consent and engineering plan approval applications can ensure that the design of the Great South Road / Road 1 intersection can cater for over dimension vehicles.</p> <p>I consider that any effects from existing activities should be addressed be addressed by Auckland Council / Auckland Transport.</p>	<p>I do not support the relief sought by the submitter.</p> <p>Submission points are captured within my peer review</p> <p>Existing effects/issues related to the cemetery should be addressed by Council / Auckland Transport</p>

Submission 11: Sрни Reddy
Seeks to decline the plan change.

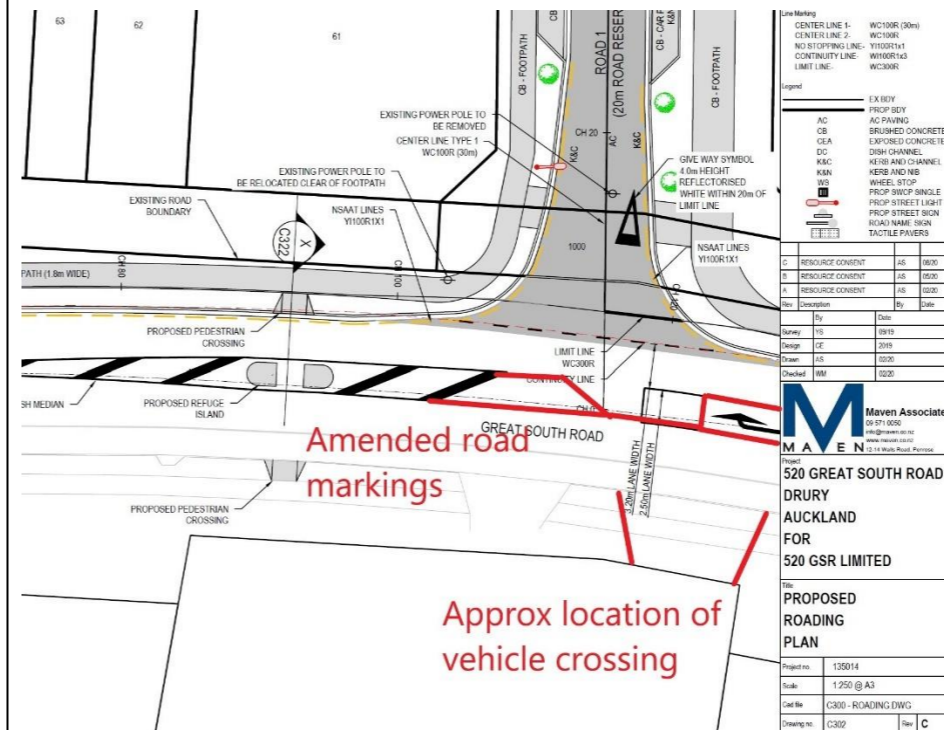
PPC52 will affect access/ flush median queuing to a newly consented vehicle crossing at 540 Great South Road as shown below.



I support the concerns raised by the submitter; however I consider that minor amendments to the design of the intersection will allow access to PPC52 without compromising access to 541 Great South Road.

The image below shows amendments to the line markings for the intersection, which has been submitted to Council as part of a separate resource consent parallel to PPC52. Further design work would be needed, but I consider that the limit line for the right turn bay can be set back slightly so it does not block access to 541 Great South Road. This may require the relocation of the Road 1 intersection a few metres to the south.

Alternatively, should a solution in this location not be feasible, the intersection could be relocated somewhat north, where there are no vehicle crossings on the western side of Great South Road.



Submission 13.1: Auckland Transport
Seeks to decline the plan change.

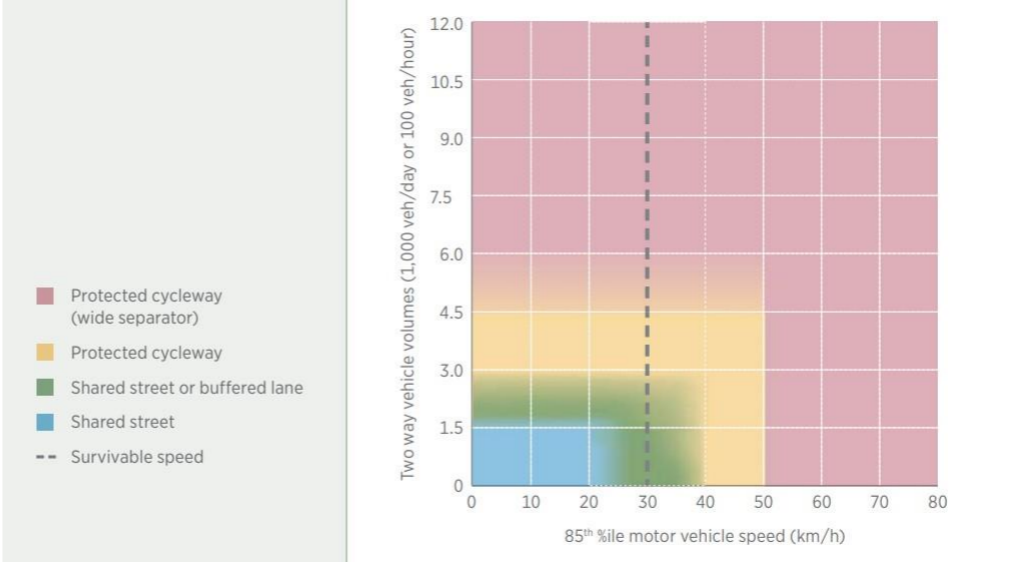
Misalignment of out of sequence release of development site and the provision of transport infrastructure upgrades.
Auckland Transport is not supportive of development proposals where there is no provision, or there is inadequate provision, for the necessary infrastructure to enable development to be appropriately serviced, such as the upgrading of the surrounding transport network where it will be required.

I share Auckland Transport's concerns about potential cumulative effects from out of sequence development, however I consider that the ITA has adequately assessed the effects from PPC52, including acknowledging the existing limited accessibility to walking, cycling and public transport.

I support the relief sought by the submitter in part, but consider that the design can be further refined as part of future resource consent applications

Support in part. Council's Planner to consider whether the Section 32 report adequately addresses development out of sequence with FULSS.

	<p>The Supporting Growth Alliance (a partnership of Auckland Transport and Waka Kotahi) has identified Great South Road as a proposed future Frequent Transport Network route requiring bus lanes - this is not expected to be required within the next 10 years and so no work has been undertaken to formally confirm what is needed in this part of the arterial corridor or to prepare any notices of requirement. Auckland Transport does not have funding to provide for any required strategic infrastructure or upgrades to support the development of such out of sequence land.</p> <p>As noted above, the Auckland Plan and the Future Urban Land Supply Strategy identifies this area to be considered for release for urban development in 2028- 2032. Auckland Transport is concerned the Proposed Private Plan Change 52 out of sequence development may adversely affect the ability of the future transport network to be upgraded to address the cumulative effects of growth associated with urbanisation of the Future Urban land within Drury-Opaheke. The Proposed Private Plan Change itself does not propose any protection for likely future widening requirements.</p> <p>The Proposed Private Plan Change could also lead to development along Great South Road without associated frontage improvements. These frontage improvements would ideally be provided for at the time of development by the developer in acknowledgement of the mitigation of effects generated by each respective site or area.</p>	<p>I support AT's comment, however the applicant has indicated its intent to protect for 5m corridor widening and provision of an urbanised berm along the site frontage. This would provide a 30m corridor width, which at a high level is sufficient to provide for 4 traffic lanes plus walking and cycling facilities.</p> <p>Refer to my discussion in Sections 3.3 and 3.4 of this report.</p>	<p>Council's Planner to consider whether specific provisions are required to secure the mitigations and improvements identified in PPC52 and the applicants' Clause 23 responses.</p>
	<p>Great South Road is currently built, in part, to a rural standard with fragmented footpaths on the eastern side along the site frontage. The developer should be required to form the site frontage. Required upgrades would include provision of footpath, kerbs and channels, earthworks to integrate with development levels, cycle facilities, street lights, berm and street trees as well as a portion of carriageway widening, land vesting and stormwater treatment.</p> <p>That the Proposed Private Plan Change incorporate provisions and / or identifies appropriate mechanisms to provide for the upgrade of Great South Road to urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable a future Frequent Transport Network.</p> <p>These provisions and / or mechanisms should include requirements addressing the following in relation to the upgrade of Great South Road:</p> <ul style="list-style-type: none"> ◆ Vesting and formation of frontage upgrades ◆ Timing of upgrade requirements ◆ Funding and delivery of the above work 	<p>I support AT's view that urbanisation of the Site frontage to Great South Road is required. Refer to my discussion in Section 3.3 and 3.4 of this report.</p>	
<p>Submission 13.2: Auckland Transport Seeks to decline the plan change.</p>	<p>Integration of the plan change road layout with the existing and anticipated local transport network.</p> <p>There are no roading plans proposed as part of the plan change as the changes sought only proposes rezoning the area. As a result, subsequent development of the subject site will occur under the general subdivision provisions of the Auckland Unitary Plan. It is considered that these provisions will not provide sufficient certainty that the effects from development within the plan change area can be mitigated.</p>	<p>I consider that the regionwide provisions of the Auckland Unitary Plan, as well as Auckland Transport's Standards and Guidelines, should be able to be relied upon for the delivery of an appropriate transport network within the Site.</p>	<p>I do not support the relief sought by the submitter</p>

	<p>The Integrated Transport Assessment accompanying the Proposed Private Plan Change identifies the need for a direct road connection from Great South Road, through the plan change area, to ultimately connect with the Park Way Road within the 29 Bellfield Road approved subdivision. The Integrated Transport Assessment indicates that this road will have a cycleway that is separate from the carriageway.</p> <p>The Proposed Private Plan Change makes no provision for this link or specification of the design elements required to be incorporated within it.</p> <p>Inclusion within the plan change of a requirement to form a link road with separate cycle facility between Great South Road and Gatland Road which should be readily capable of being extended northward. This should also indicate the alignment of the road.</p>	<p>I note that Council’s Drury-Opaheke Structure Plan does not identify any sub-regionally significant cycle links through PPC52. I am unable to find a recommendation in the TA regarding the cycleway link that Auckland Transport refers to in its submission.</p> <p>I note that the design of new streets within the Site will be subject to review as part of future resource consent applications. This will include being subject to Auckland Transport design standards and guidelines, which includes metrics for provision of cycling facilities per Section 2.2 of Auckland Transport’s Cycle Design code, as shown in the image below.</p> <p>Section 3.3 of the TA estimates a peak hour flow of around 80 veh/hr on Road 1. On the assumption that Road 1 is designed for a 30 km/hr speed environment, a protected cycleway is not required on Road 1.</p> 	
<p>Submission 13.3: Auckland Transport Seeks to decline the plan change.</p>	<p>Alignment of local link road between Great South Road and Gatland Road</p> <p>The proposed alignment of the local road servicing the subject site utilises the current unformed road reserve adjoining the Papakura South cemetery and indicates that this could be continued northward.</p> <p>Auckland Transport supports the need for a local link from Great South Road with separated cycle facilities to ultimately connect with the future Park Way Road.</p> <p>Auckland Transport, however, is concerned about the ability of the proposed alignment to be continued northwards from Gatland Road due to it straddling the boundary of two smaller substantially developed existing properties. A more appropriate alternative alignment is considered to run slightly to the west along the frontage of 46 Gatland Road where Proposed Private Plan Change 52 depicts a secondary local road intersection. This secondary road has the potential to become a ‘short cut’ for through traffic in the event that roading access to the north is created opposite it.</p> <p>That a more optimal alignment for the Great South Road to Gatland Road link is included as part of the plan change. In the event that the alignment is not changed, Auckland Transport seeks provisions to ensure the roads and intersections are designed so as not to preclude future access to the north and to avoid any adverse effects from through traffic.</p>	<p>PPC52 does not seek to establish the alignment of Road 1, between Great South Road and Gatland Road. Further, I note that the proposed extension of Road 1 further north does not form part of PPC52 or the operative Ōpaheke 1 Precinct.</p> <p>Should a connection be established between Gatland Road and Park Way Road (within the Ōpaheke 1 Precinct), this would be considered and assessed on its merits at the time that approvals are sought, which would include a requirement to integrate with any consented side roads on Gatland Road. This may include provision of traffic calming on consented roads within the Site, should a connection to the north encourage “rat-running” though the secondary local road referred to in Auckland Transport’s submission.</p> <p>I do not disagree with Auckland Transport’s submission point, however I question whether this is relevant to the Plan Change process.</p>	<p>Council’s Planner to consider whether submission point is relevant to the Plan Change process</p>

<p>Submission 13.4: Auckland Transport Seeks to decline the plan change.</p>	<p>Mechanisms to ensure implementation of required mitigation measures to address effects. Auckland Transport’s assessment of the Proposed Private Plan Change, including the supporting Integrated Transport Assessment, has identified a number of mitigation measures to address the potential effects on the transport network. These include:</p> <ul style="list-style-type: none"> ◆ Proposed new intersection with Great South Road to service the enabled redevelopment ◆ Provide some widening along the Great South Road frontage to accommodate a painted flush median and right turn pocket (accessing the subject site) ◆ Upgrading the frontage of Gatland Road and Great South Road to urban standards (as mentioned above) ◆ Intersection of Gatland Road and the proposed link road (servicing the subject site) to provide for a roundabout ◆ Provision of crossing facilities along Great South Road given the increase in demand from the enabled development for pedestrians and cyclists to cross Great South Road to access schools and bus stops. ◆ There is a need to ensure that the provisions enabling the proposed development also provide certainty around the implementation and timing of required mitigation measures. <p>That the Proposed Private Plan Change incorporate provisions and mechanisms to provide certainty around the assessment of the local network improvements required to mitigate the effects from development enabled under the plan change. That the Proposed Private Plan Change incorporate provisions allowing the staging of subdivision and associated mitigation related works to be a matter for discretion.</p>	<p>I support the mitigation measures identified in Auckland Transport’s submission, other than its view that a roundabout at the intersection of Gatland Road and Road 1 is required. In my opinion the form of this intersection can be determined as part of future resource consent applications.</p> <p>As discussed in Section 3.1 of this report, I recommend that Council’s Planner consider whether specific provisions are required to ensure delivery of mitigations identified in the TA and Clause 23 responses from the applicant.</p>	<p>Council’s Planner to consider whether specific provisions are required to secure the mitigations and improvements identified in PPC52 and the applicants’ Clause 23 responses.</p>
<p>Submission 13.5: Auckland Transport Seeks to decline the plan change.</p>	<p>General – Plan provision mechanisms to address wider cumulative effects of incremental development. Proposed Private Plan Change 52 proposes to rezone Future Urban zoned land without any associated specific transport provisions which are needed to create greater certainty that the potential adverse effects from the development are assessed and mitigated. The incremental rezoning of small areas of Future Urban zone land within the same local transport catchment can also reduce the ability to realise and stage integrated and connected transport networks unless there are appropriate provisions to ensure this. That the Proposed Private Plan Change incorporate appropriate provisions / rules to address the matters raised within this submission. These provisions could potentially be addressed by inclusion within the Auckland Unitary Plan of a precinct plan and associated provisions and or alternative mechanisms</p>	<p>Refer to my comments on Auckland Transport submission points 13.1 and 13.4</p>	<p>Council’s Planner to consider whether matters related to out of sequence development have been addressed. Council’s Planner to consider whether specific provisions are required to secure the mitigations and improvements identified in PPC52 and the applicants’ Clause 23 responses.</p>
<p>Submission 14: David and Sarah Bryant. Seeks to decline the plan change.</p>	<p>Concern that the footpath on the western side of Great South Road does not extend over Slippery Creek Bridge, and a lack of pedestrian crossings over Great South Road.</p>	<p>I share the submitters concern and noted the absence of a pedestrian crossing point at the Slippery Creek Bridge during my initial review of PPC52. However, I considered that this was an existing deficiency that should be addressed by Auckland Transport.</p>	<p>I support the submitter; however I recommend that this is an existing deficiency that should be addressed by Auckland Transport.</p>

	Concern about the impact of the road widening on existing residents' properties.	Any road widening to support PPC52 would be provided by vesting land within the Site, existing residents' properties would not be affected. The long term form and function of Great South Road is being investigated by Auckland Transport as part of the Supporting Growth Alliance, which will include consultation with existing residents.	I do not support the relief sought by the submitter
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Table 2: Further submission summary and commentary

Submitter	Summary of submission point	Flow comment	Status
Auckland Transport: FS01.1	Support in part Submission Point 11.1 from Srin Reddy Auckland Transport is supportive in part of submission point 11.1. Further analysis and investigation should be undertaken by the applicant as a part of this plan change process into the suitability of the location and/or design of the proposed intersection with Great South Road, Papakura. If the plan change is to be approved, the plan change should be amended, as required, to reflect the outcome of this analysis and investigation.	I support the concerns raised by the submitter; however I consider that minor amendments to the design of the intersection will allow access to PPC52 without compromising access to 541 Great South Road.	I support the relief sought by the submitter in part, but consider that the design can be further refined as part of future resource consent applications. Refer to my response to Submission point 11.1 in Table 1.
Wainono Investments Limited: FS04.3	Disallow Submission Point 13.1 from Auckland Transport The requirement sought to upgrade Great South Road puts too much obligation on the plan change land owners when the upgrade of Great South Road has much wider benefits beyond the plan change area. Importantly, there is nothing in the plan change that will adversely affect the ability for Auckland Transport to undertake any necessary upgrades to enable a future Frequent Transport Network. The Unitary Plan and the RMA 1991 have sufficient safeguards at subdivision in respect of these matters raised by Auckland Transport. In any event, the development of the property at 21 Gatland Road owned by Wainono Investments Limited will not have any adverse impact on Great South Road or its future upgrade, and should not be subject to such requirements.	I understand that Auckland Transport seeks the following from land owners within PC52 <ul style="list-style-type: none"> ◆ Vesting and formation of frontage upgrades ◆ Timing of upgrade requirements ◆ Funding and delivery of the above work ◆ Protection for future land acquisition for corridor widening I support these outcomes, and consider the vesting and formation of frontages is required to mitigate transport effects of the development, as discussed in my response to Submission Point 11.1 above.	I do not support the relief sought by the submitter.
Wainono Investments Limited: FS04.4, FS04.5, FS04.6, and FS04.7	Disallow Submission Points 13.2, 13.3, 13.4, and 13.5 from Auckland Transport Opposes the imposition of indicative roading or similar on the plan change land. A link road (paper road) already exists between Gatland Road and the balance of the plan change land, making this the logical alignment here. Road layout for the balance of the plan change area is best left to subdivision design stage when it is done in conjunction with wider subdivision design and is not appropriate or necessary for the plan change.	I support the relief sought by the submitter in part, refer to my response to Submission Points 13.2, 13.3, 13.4, and 13.5 above.	Council's Planner to consider whether specific provisions are required to secure the mitigations and improvements identified in PPC52 and the applicants' Clause 23 responses.

Table 3: Papakura Local Board feedback

Local Board feedback	Flow comment
xv) The board has concerns about the lack of off-street parking in new developments in general. The design of a development needs to allow for onsite parking for each lot to minimize cars that will be parking on the berms as there is nowhere else to park.	Parking requirements for the site are proposed to be subject to Chapter E27 of the AUP(OP). The proposed MHU zone has very similar minimum parking requirements to the existing surrounding MHS zone. In my view there is no reason why a higher parking rate is required for this site compared with the surrounding area, or the regionwide standards of the AUP(OP).
xvi) The nearest supermarket is in Papakura, therefore is it logical to expect that each housing unit in the proposed development will have a minimum of two cars.	

<p>xvii) A minimum of two onsite parking spaces for every unit should be a requirement in the consent conditions.</p>	
<p>xviii) On street visitor parking should also be made available and be a required in the consenting process.</p>	
<p>xix) The board has fielded complaints from other subdivisions in relation to narrow road widths and the inability for emergency and service vehicles to access. There are already issues within the Addison development with narrow roads not being wide enough for emergency vehicles or rubbish trucks to enter. The Police have also approached the board about this issue. Please ensure input on this development is sought from the fire, ambulance and police services. The services have complained to the board in the past about the narrow widths of new subdivision roads.</p>	<p>While concept designs for new roads are included in the notified documents, PPC52 does not establish the width of new roads that would be required to service the development. The design of new roads will be subject to Auckland Transport's Transport Design Manual during resource consent and Engineering Plan Approval stages. I appreciate the concerns of the Local Board regarding the Addison development, and I understand that there have been several meetings between Auckland Transport, Auckland Council and emergency services regarding road width and layouts. I consider that this matter is not specific to the PPC52 and is better addressed through Auckland Transport standards and guidelines.</p>
<p>xxi) The board supports the submitters' requests for traffic treatments relating to the development. Great South Road is a busy road. This development will add to the traffic volumes. The right hand turn on to Great South Road from the "new road" and the Gatland Road intersections will be dangerous. It will also be dangerous to turn right into the "new road" and Gatland Road. The "new road" or the Gatland Road intersection may need some sort of treatment to slow the Great South Road traffic to make it safer for traffic to turn right.</p>	<p>In general I consider that the right turn movements at the Great South Road/Gatland Road and Great South Road/"New Road" intersection can be safely accommodated, and note that right turn movements into/out of side streets onto arterial roads are not uncommon. However, I consider that the existing sight distance shortfall at the Great South Road/Gatland Road intersection should be addressed by Auckland Transport/developers during the resource consent stage (refer to Section 3.2 of this report), and minor conflicts at the Great North Road/"New Road" intersection will need to be considered during the resource consent stage (refer to my response to Submission 11: Srin Reddy in Table 1)</p>
<p>xxii) Traffic calming measures should be required as part of the "new road" development to slow traffic down as it could become a "rat run" from Gatland Road to Great South Road going south.</p>	<p>This is a matter for consideration for resource consent. The design of new roads will be subject to Auckland Transport's Transport Design Manual during resource consent and Engineering Plan Approval stages, which includes traffic calming guidance.</p>
<p>xxiii) Consideration should also be given to the impact of the work about to begin on the third lane on the State Highway One Motorway from Papakura to Drury as traffic will be diverted on to Great South Road to allow work to continue on the motorway. Presumption that people will use public transport</p>	<p>Section 4.1 of Appendix 6: Transport Assessment provides traffic modelling results for the Great South Road/Gatland Road and Great South Road/"New Road" intersection. The resulting "degree of saturation" results, which provides a quantitative reflection of congestion, show that there is a large amount of capacity still available at the intersections. In my opinion rerouted traffic during construction works will have some effect on the efficiency of these intersections, however this is unlikely to result in significant deterioration such that development traffic from PPC52 would result in unsafe operation.</p>
<p>xxiv) While current thinking is everyone should be using public transport (PT), the reality is that the PT option does not work for everyone. PT does not necessarily run near where the people need it to go or within the timeframes people need it. Even if they can take public transport to work, they still need to have vehicles for the weekly shopping accessing medical services and visiting friends or relatives.</p>	<p>Section 3.3 of Appendix 6: Transport Assessment details the vehicle trip generation rates assumed by the applicant. The assessment adopts a 0.8 veh/hr per dwelling trip rate which, in my view, is appropriate. While there is the opportunity for the future residents to have good public transport access in the future, with Great South Road identified as a Frequent Transit Network for bus services in the Drury-Ōpāheke Structure Plan, I am satisfied that the Transport Assessment has assessed the traffic effects should public transport usage for the site be low.</p>

5 SUMMARY AND CONCLUSION

I consider that the applicant has adequately assessed the transport effects of PPC52.

I recommend that

- ◆ Council's Reporting Planner consider whether the regionwide provisions of the Unitary Plan are robust enough to ensure the cumulative transport effects of PPC52 can be appropriately assessed and managed/mitigated should site-by-site resource consent applications be received. Refer to Section 3.1 of this report, and Submission 13
- ◆ sufficient safe intersection site distance is achieved at the intersection of Gatland Road and Great South Road prior to development of land in the PPC52 Site fronting Gatland Road, or any new road connection to Gatland Road. Refer to Section 3.2 of this report
- ◆ that a pedestrian crossing facility is provided on Great South Road, near Road 1, and that a footpath is provided along the entire Site frontage with Great South Road prior to development of land fronting Great South Road, or any new road connection to Great South Road. Refer to Section 3.3 of this report
- ◆ the applicant vests sufficient frontage on Great South Road to provide a right turn bay and compliant berm along the PPC52 Site frontage, and provide a 5.0 m development setback from the existing road boundary to allow future widening of the Great South Road corridor. Refer to Section 3.4 of this report
- ◆ that transport connectivity to Future Urban Zoned land to the south/east of the PPC52 Site is provided as part of future subdivision. Refer to Section 3.5 of this report
- ◆ that the intersection of Road 1 with Great South Road is designed to integrate with the consented vehicle crossing for 541 Great South Road. Refer to my response to Submission 11 in Section 4 of this report
- ◆ that a pedestrian crossing on Great South Road, north of Slippery Creek Bridge, be provided by Auckland Transport. Refer to my response to Submission 14 in Section 4 of this report.

I recommend that Council's Reporting Planner consider the following submission points. (Refer to Section 4 for further detail)

- ◆ Traffic noise effects, refer to Submission 2, 3 and 6
- ◆ Flooding effects on Gatland Road, refer to Submission 5 and 6
- ◆ Existing traffic effects on Gatland Road related to activity at the cemetery, refer to Submission 7
- ◆ Whether the Section 32 report adequately addresses development out of sequence with FULSS, refer to Submission 13
- ◆ Whether the alignment of Road 1, between Great South Road and Gatland Road, should be established as part of PPC52, refer to Submission 13.

Should the mitigations identified in the ITA be implemented as part of future subdivision/land use consents for the Site, I consider that PPC52 can be approved and that with the mitigation outlined above will support a safe and efficient transport network.

APPENDIX A

Clause 23 request summary

**Memo : Technical specialist report to contribute towards
Auckland Council section 42A hearing report)**

13 January 2021

To: Sanjay Bangs
Planner, Planning Central and South Plans and Places
Auckland Council

From: Lisa Mein
Senior Urban Designer on behalf of Urban Design Unit
Auckland Council

**Subject: Private Plan Change 52 for 520-522 Great South Road and 21 Gatland Road,
Papakura, Urban Design Review**

1.0 Introduction

- 1.1 This review addresses the urban design effects of the above proposed private plan change by 520 Great North Road to rezone 4.6268 hectares at their landholding in Papakura from Future Urban zone to Mixed Housing Urban (MHU) in light of the Drury-Opāheke Structure Plan. This review does not address any subsequent resource consent for use of the land following plan change.
- 1.2 I hold the qualifications of Bachelor of Planning from University of Auckland (1994) and Master of Arts (Urban Design) from the University of Westminster in London (2001). I am a full member of Te Kokiringa Taumata - the New Zealand Planning Institute, a member of ICOMOS NZ and a member and current co-chair of the Urban Design Forum Aotearoa.
- 1.3 I have in excess of 25 years' experience as an urban designer and planner in New Zealand, the UK and Ireland. Prior to establishing Mein Urban Design and Planning in 2019, I worked for Boffa Miskell Limited for fifteen years. In the final three years of that time, I was a Senior Principal and managed the Auckland Urban Design and Landscape Planning team.
- 1.4 Recent relevant experience includes the following:

Auckland Council, Auckland Unitary Plan Proposed Plan Change 34 2019 - Present

Preparation of a character statement for Howick Village (Howick Business special character area), including amendments to the planning maps to add four new sites to the special character area and identification of character buildings. Assistance with s32. Hearing forthcoming in late May 2020.

Auckland Council, Auckland Unitary Plan Proposed Plan Change 25 (Private) - 2019

Urban design review of Proposed Private Plan Change 25 to the Auckland Unitary Plan and submissions/further submissions to that Proposed Plan Change. Included preparation of material for the s42A report, attendance at the Council hearing and assistance with preparation of the Council's closing statement.

Auckland Council, Auckland Unitary Plan Proposed Plan Change 26 - 2018-19

Preparation of a plan change by re-drafting the provisions of the Special Character Areas: Residential to ensure better consistency across the Auckland Unitary Plan with a view to improving clarity both for applicants and those administering the plan.

Auckland Unitary Plan Hearings 2014-2016

A key role for Auckland Council on the Special Character overlay provisions of the Proposed Auckland Unitary Plan throughout the Independent Hearing Panel process and at the Environment Court

- 1.5 When the request for a private plan change was first lodged, the urban designer tasked with reviewing the initial information on behalf of Auckland was Sarah Lindsay. I have taken this over following notification and receipt of submissions. I note Sarah did not request any further information, however a request relevant to urban design was made with respect to the quality of access from the site to convenience retail. I address this below in sections 3 and 5.
- 1.6 In writing this memo, I have reviewed the following documents:
 - Request for Private Plan Change, by Barker & Associates, dated 25 May 2020
 - Private Plan Change Proposed Zone Plan, by Barker & Associates, dated 30 May 2019
 - Urban Design Statement, by Barker & Associates, dated 27 June 2019
 - Drury-Opāheke Structure Plan, Auckland Council, dated August 2019
 - Auckland Future Urban Land Supply Strategy, Auckland Council, dated July 2017
 - Request for Further Information, dated 6 April 2020
 - Responses to the RFI, dated 22 May 2020
 - Submissions and Further submissions to the proposed private plan change

2.0 Background

- 2.1 The Plan Change area was rezoned through the development of the AUP from Rural Plains under the legacy Papakura District Plan to Future Urban. The Future Urban zone is applied to greenfield land that has been identified as suitable for urbanisation. In order to be used for urban activities it is required to be rezoned. The process requires preparation of a structure plan and plan change.
- 2.2 Auckland Council, with input from landowners, prepared a Structure Plan for the Drury-Opāheke area in 2019. Drury-Opāheke is part of a much greater southern growth area comprising approximately 45% of the future urban areas in Auckland. The Drury-Opāheke Structure Plan (DOSP) applies to 1921 hectares of predominantly rural land surrounding Drury, Opāheke and Karaka. It was adopted in August 2019.
- 2.3 The Auckland Future Urban Land Supply Strategy (FULSS) anticipates the part of the DOSP land east of SH1, which includes the plan change area, being ready for development between 2028-2032. Development ready means that urban zoning and bulk infrastructure is provided.
- 2.4 The plan change area is outlined in Figure 1. It is located towards the north-western part of the wider DOSP area and is contiguous with existing development. The subject site and its

surrounds are identified as MHU both within the draft and adopted DOSP land use maps. This anticipates a medium-high intensity of residential development due to the proximity both to Drury Village and to existing lower intensity settlement.



Figure 1 Aerial depicting proposed plan change area

3.0 Overall zoning response

- 3.1 A plan change to the AUP is required to give effect to the DOSP. The proposed plan change was developed in parallel with the development and adoption of the DOSP. The proposed zoning for the plan change area of MHU, allowing for higher density residential living, is therefore consistent with the direction of the DOSP for this land.
- 3.2 The preferred option outlined within the proposed plan change documentation is to rezone the plan change area MHU as per Figure 2 below. It is not proposed to create a precinct and no site-specific provisions are proposed for the plan change area. Therefore, following rezoning, the provisions for the MHU zone would apply to the land and any subsequent resource consents would be assessed against those provisions.
- 3.3 The land in question is already anticipated for future urban development per the RPS as it was included within the Rural Urban Boundary and zoned Future Urban, the proposed plan change is therefore consistent with, and gives effect to, the Urban Growth objectives and policies within Chapter B2 of the RPS.
- 3.4 The timing for the plan change, and its likely development, is significantly earlier than anticipated by the Structure Plan and FULSS. The extent to which this is an urban design issue relates primarily to proximity of the land to existing services and amenities, more particularly Papakura Metropolitan Centre and Drury village, and to the transport network. I note the plan change area is located 1.5km from Drury Village, which is approximately a 20-30 minute walk. At that distance some may walk, while others will opt for motorised transport.

- 3.5 The Structure Plan indicates a requirement for Drury village to expand to become a large main centre to serve the wider area. If this occurs, the plan change area will be in a prime location for access to services and amenities and, in turn, development of the plan change area will support the expansion of the village.
- 3.6 Although in time the area around the village is likely to undergo plan changes leading to growth and transformation, this is not part of the proposed plan change. From an urban design perspective, it would be preferable that social, as well as physical, infrastructure precede residential development.
- 3.7 The plan change area is adjacent to the Papakura South Cemetery, which provides a significant area of open space for reflection and passive recreation. It is also within close proximity (a 10 minute walk) to Opāheke Reserve, providing significant active recreation opportunities

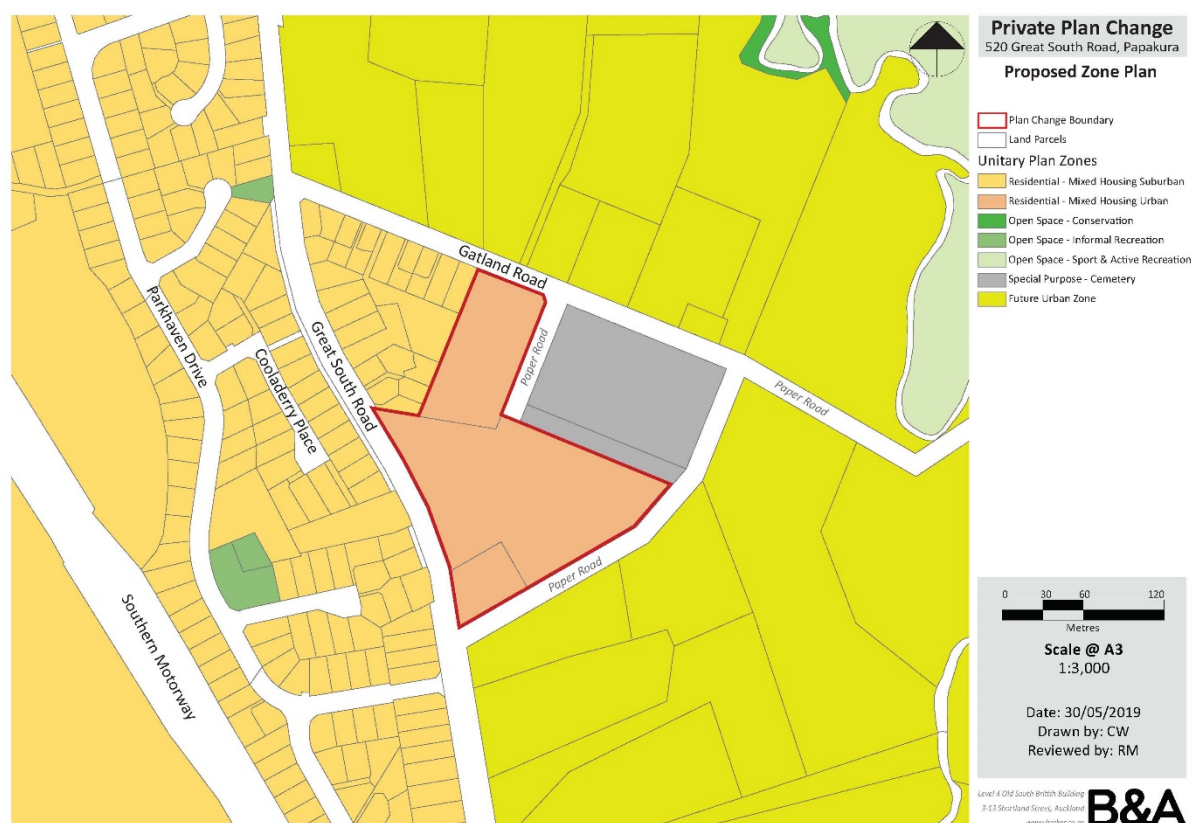


Figure 2 Plan Change Zoning Map (source: Barker & Associates)

- 3.8 I note the timing of the plan change may also affect infrastructure provision, in particular transport and wastewater, however I assume other specialists are addressing adequacy of existing infrastructure to support the proposed plan change.
- 3.9 In summary, other than the timing of the plan change relative to others within the DOSP area, there are no significant urban design issues for the private plan change as the zoning proposed is consistent with the outcome anticipated within the DOSP.

4.0 Applicant's assessment

The Urban Design Assessment, that forms Appendix 5 of the Proposed Plan Change material, was prepared in parallel with the Draft DOSP. This sets out a very clear site and neighbourhood context, including an analysis of the existing access and movement framework. I note there is a formed footpath along Great South Road on the western side only.

The Urban Design Assessment examines the site's conditions, existing context, history and development patterns, built form and land use and provides a SWOT analysis to inform the future opportunities.

Section 4 of the Urban Design Assessment report sets out key design moves to inform future development of the site, and indicative site masterplan and an indicative masterplan of the site within its wider neighbourhood content. However, it is noted that this has not been incorporated into the proposed plan change report as there are no specific precinct provisions proposed. Rather this demonstrates that the land can be developed consistent with the aspirations of the DOSP and the provisions within the AUP and could also be used inform future resource consents.

The urban design assessment confirms the optimal use of the land would be medium density residential development as enabled through the provisions of the MHU. The report provides a thorough analysis of the site, its context, the opportunities and constraints and possible development options and taking all of this into account concludes the proposed MHU is the most appropriate zone for the land. In my opinion, this has used a robust urban design methodology to reach a conclusion that is consistent with the intent of the DOSP.

5.0 Submissions

A total of fourteen submissions and four further submissions were received in response to the proposed plan change. Submissions in support acknowledge that the plan change is consistent with the DOSP.

Submissions 2 and 3 were received from neighbouring property owners at 3/516 and 516B Great South Road. Both are concerned at the impact of future residential development on their current residential amenity and seek that the proposed plan change be declined. I am unclear as to whether either of these submitters inputted into the development of the DOSP. From an urban design perspective, the proposed plan change is consistent with the direction for future land use set out in the DOSP. The indicative site masterplan depicts detached dwellings adjoining the boundaries of the existing residential development to provide a transition between the existing low density and medium density envisaged for this area. The standards in the MHU for building height (H5.6.4), height in relation to boundary (H5.6.5) and height in relation to boundary adjoining lower intensity zones (H5.6.7), should in combination ensure an appropriate transition, albeit the area will be transformed from peri-urban to urban in character.

Submission 5, by two households on Gatland Road, is concerned with piecemeal development. Notwithstanding the specific (non-urban design related) issues raised within this submission, all of the land within the wider Drury-Opāheke area was considered during the detailed preparation of the DOSP. While this particular parcel is being proposed for a plan change to bring forward the live zoning of the land in advance of other parcels, the

framework for this site and the wider area had been created and agreed via the structure plan process.

Submission 6 at 518A Great South Road, expresses similar concerns about the impact of future residential development on their current amenity, which I have addressed above. The other concern raised is with respect to provision of open space and social infrastructure. I note submission 7, which is largely in support, expresses a similar concern. The DOSP identifies two neighbourhood parks and a small centre proximate to the subject site, but nothing located on this land specifically.

Submission 14, at 555 Great South Road, opposes the proposed plan change, expressing concern at the distance of the land from amenities and social infrastructure.

The key urban design related concern for submissions 5, 6, 7 and 14 appears to be the timing of the proposed plan change in relation to social infrastructure for the locality. I have some sympathy for the submitters, as ideally from an urban design perspective social infrastructure would be advanced prior to residential development. However, in this instance I have less concerns as the plan change area is contiguous with the existing settlement. Furthermore, the DOSP has established a framework for the wider area, with which the proposed plan change is consistent.

6.0 Conclusions and recommendations

Overall PC52 has properly considered the urban design impacts of the development on the existing and intended future environment of the wider Drury-Opāheke area. I support the approach to residential zoning of the site, which is consistent with the DOSP, the direction and framework of the AUP and gives effect to the RPS (in particular Chapter B2). In my opinion this will also support the direction of the NPS-UD, while acknowledging the AUP has not yet been amended to give effect to this.



Lisa Mein

MA (Urban Design), BPlan, MNZPI

11 May 2021

To: Sanjay Bangs - Planner, Auckland Council

From: Chloe Trenouth, Consultant Planner; and Danny Curtis, Catchment Planner

Subject: Private Plan Change – PC52 520 Great South Road – Stormwater Assessment

1.0 Introduction

- 1.1 Healthy Waters has undertaken a review of the private plan change (plan change), on behalf of Auckland Council in relation to stormwater effects. Danny Curtis reviewed the plan change in relation to technical stormwater issues, and Chloe Trenouth undertook a planning review in relation to stormwater issues.
- 1.2 In writing this memo, the following documents have been reviewed:
- Planning and Section 32 Report
 - Drury Opaheke Stormwater Management Plan
 - Appendix 7: Stormwater Management and Flooding Assessment
 - Appendix 8: Engineering and Infrastructure Report
 - Appendix 11: Stormwater Management Plan (May 2020)
 - Revised Stormwater Management Plan (May 2021)
 - Revised Infrastructure Report (May 2021)

2.0 Key Stormwater Issues

- 2.1 Healthy Waters assessed the plan change information when it was lodged in May 2020 and requested further information to address stormwater issues. Specifically, Healthy Waters requested a Stormwater Management Plan (SMP) to be provided in support of the plan change. The issue of whether precinct provisions were needed to support the stormwater management approach proposed was also raised.
- 2.2 Healthy Waters reviewed the May 2020 SMP and considered it to be sufficient to support the plan change because it achieves integrated stormwater management consistent with the Auckland Unitary Plan (AUP) objectives and policies for water (Chapter E1). Healthy Waters continues to have concerns that the plan change does not propose any precinct provisions to support the implementation of the proposed stormwater management approach. Instead relying on the existing stormwater provisions of the AUP (Chapter E9 and E10).
- 2.3 The key issue is that the existing stormwater provisions within the AUP will not achieve the outcomes proposed by the SMP. Without precinct provisions the plan change lacks certainty that integrated stormwater management will be achieved. Specifically, the issue of stormwater quality.
- 2.4 The applicant proposes that the SMP be adopted under the Regional Stormwater Network Discharge Consent (NDC). In order for this to occur the SMP needs to be prepared in accordance with Schedule 4 of the NDC and be adopted in principle by Healthy Waters as part of the First Schedule Plan Change Process.
- 2.5 Feedback was provided to the applicant on the adequacy of the SMP for adoption under the NDC and further revisions were requested for clarity and consistency. A revised SMP (May 2021) was received from the application on 7 May 2021. The revised SMP is 400 pages long and insufficient time has been provided to provide a thorough assessment of this document. Unfortunately the revised SMP is more unclear and confused, raising further concerns. However, Healthy Waters considers that any issues could be resolved prior to the hearing. Therefore this memo seeks to clarify any outstanding issues that still need to be addressed by the applicant.
- 2.6 The key reason for the confusion appears to be the level of detail required to support the plan change alongside an application for subdivision consent. Initially Healthy Waters was broadly

comfortable with the stormwater management approach proposed, with some outstanding technical issues (i.e. raingardens in the road) that were expected to be resolved through the SMP or Infrastructure Report in support of the subdivision. The combined hearing for the plan change and subdivision consent provided the opportunity to consider the detailed stormwater management approach, and on this basis precinct provisions may not have been required.

- 2.7 However, the revised SMP focuses only on the development at 520 Great South Road and loses the overview that it is supposed to provide for the entire plan change area. Therefore although it may be clear what is intended for 520 Great South Road, it is no longer clear what outcomes are anticipated for the other areas (21 Gatland Road and 522 Great South Road).

3.0 Applicant's assessment

- 3.1 The plan change proposes to apply the Residential - Mixed Housing Urban Zone across the site. The revised SMP has been prepared to address the requirements of Schedule 4 of the NDC, assessing the existing site and planning context. A treatment train approach is proposed to achieve water quality, hydrology mitigation and water sensitive design outcomes using a Best Practicable Option toolbox to determine the appropriate device during design for development. All stormwater devices are expected to be designed in accordance with guidelines in GD01.
- 3.2 Section 8.2.1 of the revised SMP illustrates the stormwater management strategy. In summary, the stormwater management approach requires the following:
- Retain and enhance intermittent streams including riparian margins
 - Residential roof areas to use inert building materials
 - SMAF 1 - retention and detention of stormwater runoff from all impervious areas.
 - Water quality pre-treatment for roads, carparking and High Contaminating Carriageway by gross pollutant traps, bioretention devices and proprietary devices
 - Discharge to the receiving environment via green outfalls where practical
- 3.3 Flood management is discussed in section 8.2.4.2 of the revised SMP. Attenuation is identified as not being required within the plan change area because peak flows can be passed forward before peak flows from the greater catchment arrive (revised SMP section 7). This approach is consistent with the Drury-Opaheke Stormwater Management Plan prepared in support of the Drury-Opaheke Structure Plan and is supported by Healthy Waters. However, the revised SMP does not identify or assess whether there would be any downstream impacts.
- 3.4 Water quantity is discussed in section 8.2.4 of the revised SMP identifying the range of methods that can achieve retention and detention: infiltration, bio-retention, and rainwater tanks (including reuse where there is demand). The general approach to water quantity management is to provide a minimum of SMAF1 hydrological mitigation for all impervious surfaces in the plan change area. The revised SMP identifies preferred stormwater management devices and methods from a toolbox of choices. A falling head soakage test was completed, identifying a percolation rate of 4.2mm/hr (section 2.4) determining that infiltration is considered feasible for the plan change area.
- 3.5 Water quality is discussed in section 8.2.3 of the SMP, identifying that the approach is to treat all contaminant generating impervious areas at or near source by a water quality device to target sediment, metals and gross pollutants. Use of inert building materials will prevent generation of contaminant-laden runoff, therefore quality treatment will not be required for roofs. However, if inert building materials are not used then treatment will be required. No high contaminant generating roads are proposed in the plan change area, but all public roads and carparks will be treated using vegetated bio-retention devices such as swales, raingardens and tree pits. Riparian margins are identified as a secondary benefit by disconnecting impervious areas from the receiving environment.
- 3.6 The applicant's AEE identifies that the SMP demonstrates that the potential effects of rezoning on flooding downstream and on water quality will be less than minor. That specific mitigation measures would be considered as part of the resource consent process via the certification requirements of the Council's NDC. The section 32 analysis provides no evaluation of methods for addressing stormwater effects, only assessing the rezoning proposal itself in terms of achieving the objectives.

4.0 Assessment of stormwater effects and management methods

- 4.1 Healthy Waters review of the SMP determines that it is not consistent with the requirements of the NDC and therefore at this stage it is not adopted in principle. The subdivision consents at 520 Great South Road demonstrate that insufficient guidance is provided by the revised SMP to deliver the outcomes of the NDC, and why it is appropriate to include appropriate precinct provisions in the AUP to pick up issues that are not currently addressed. While this may be less of an issue for 520 Great South Road because the subdivision is being considered concurrently, the plan change is still required to guide development of 21 Gatland Road and 522 Great South Road in the future.
- 4.2 Although the SMP identifies that a minimum of SMAF 1 hydrological mitigation will be implemented, there are not such controls applied to the plan change area. Without the SMAF Control notated on the planning maps, there is no ability to require hydrology mitigation at the time of development, including the imposition of relevant conditions. Healthy Waters is also concerned that the plan change makes no provision for achieving stormwater quality outcomes set out in the SMP because the AUP only requires treatment of high contaminant generating activities (Chapter E9). There is no requirement for inert building materials to be used for roofs of residential development, and more importantly no process for requiring or assessing treatment where inert building materials are not implemented. Furthermore, there is no provision for requiring treatment of local roads or jointly owned access lots. Therefore, Healthy Water supports the stormwater management approach as set out in the SMP but does not support the lack of precinct provisions to support its implementation.
- 4.3 Where resource consents are identified as a restricted discretionary activity, only those matters that are identified for discretion can be considered. Therefore without relevant matters of discretion or provisions in the AUP to address the outcomes of the SMP it is not possible to impose the necessary conditions on consents. In accordance with section 108AA of the RMA a consent authority must not include a condition in a resource consent unless – the applicant agrees to it; or the condition is directly connected to an adverse effect of the activity on the environment, and/or an applicable district or regional rule, or a national standard. Conditions cannot be imposed that require an applicant to comply with the NDC as a third party resource consent.

Subdivision consents

- 4.4 The process of SMPs anticipates an increasing degree of detailed information at each of the development stages. At the structure plan stage key issues are identified along with high level principles (i.e. passing flood flows forward). At the plan change stage further detail is required to test the high level principles for the specific area and identify the best practicable option for stormwater management (i.e. passing flood flows forward may not be appropriate). Then at the resource consents stage the stormwater management system is designed in accordance with the outcomes identified at the plan stage (i.e. providing attenuation if necessary).
- 4.5 There are currently two applications lodged with the Council for subdivision within the plan change area, at 21 Gatland Road (BUN60336702) and 520 Great South Road (BUN60356792). Whilst the application for 520 Great South Road is lodged by the applicant for the plan change and is being heard concurrently with the plan change, the application at 21 Gatland Road is not. The stormwater management approach differs across the two sites.
- 4.6 An updated Infrastructure Report prepared by Maven Associates was supplied on 7 May 2021 in support of the resource consent at 520 Great South Road. It specifies that onsite rainwater storage tanks (on lots) and a mix of raingardens (on roads and rights of ways) will provide at source retention and detention. In terms of water quality, the Infrastructure Report identifies inert building materials, and treatment of all trafficable surfaces using raingardens and proprietary devices. This approach is generally consistent with the SMP; however may not be the most efficient method of achieving the outcomes.
- 4.7 The Engineering Infrastructure Report for the resource consent for 21 Gatland Road was prepared by Enable in March 2019. It is noted that this application has been on hold since May 2019 and would be required to be updated to be consistent with any approved SMP.

Relying on existing AUP provisions

- 4.8 Applying SMAF1 to the plan change as indicated by the SMP is supported by Healthy Waters provided the AUP control is applied including annotating the AUP planning maps. This ensures that the relevant controls are identified and imposed at the time of consent. The SMAF Control provides sufficient flexibility to achieve hydrology mitigation outcomes in different ways.
- 4.9 Relying on existing provisions in Chapter E9 for quality treatment will only result in the treatment of high contaminant generating roads. This approach is inadequate and is not consistent with the SMP in support of the plan change. The only mechanism to address quality treatment of stormwater would be via the subdivision provisions.
- 4.10 The subdivision provisions in Chapter E38 require infrastructure to be planned and provided for in an integrated and comprehensive manner to support subdivision and development, and to be in place at the time of subdivision or development (Objective E38.2.3). The function of flood plains and overland flow paths to safely convey flood waters are also required but are not addressed further because the proposed approach to rely on existing provisions is satisfactory in this regard.
- 4.11 Subdivision Policy E38.3.22 is particularly relevant to Healthy Water's concerns. The policy requires subdivision to be designed to manage stormwater in accordance with any approved stormwater discharge consent or network discharge consent, and in a manner consistent with stormwater management policies in E1 by applying an integrated stormwater management approach. The policy also requires subdivision to be designed to maintain or progressively improve water quality (e), and to be designed in an integrated and cost-effective way (f). As subdivision is generally a restricted discretionary activity, these policies are achieved through the matters of discretion and assessment criteria in E38.12.
- 4.12 The relevant matters of discretion are set out in E38.12.7(b) the effect of infrastructure provision and management of effects of stormwater. Relevant assessment criteria are in E38.12.2.7(b) refer back to the policies. Therefore, as a restricted discretionary activity subdivision is required to implement Policy E38.3.22 for stormwater management, including the requirement to manage stormwater in accordance with an approved NDC. Where an SMP has been adopted under the NDC, subdivision is therefore required to be in accordance with it and appropriate conditions can be imposed.

Need for precinct provisions

- 4.13 A section 32 evaluation is required to identify whether the objectives of a proposal are the most appropriate to achieve the purpose of the RMA, and whether the provisions are the most appropriate way to meet the objectives. The applicant's section 32 report identifies the objective to rezone land to Mixed Housing Urban and therefore relies on the existing objectives of that zone. However, in applying a new zone it is also appropriate to consider whether the provisions will achieve other relevant objectives and policies of the AUP. In relation to stormwater management in greenfield areas the key policies are E1.3.8, which requires avoidance as far as practicable or otherwise to minimise or mitigate adverse effects of stormwater runoff on freshwater and coastal water; and E1.3.10 that describes what constitutes an integrated stormwater management approach. These policies anticipate that the generation and discharge of contaminants is minimised, and regard is had to reducing stormwater flows and contaminants at-source prior to the consideration of mitigation measures and the optimisation of on-site and larger communal devices where these are required.
- 4.14 The NPS for Freshwater Management (NPSFM) recently came into force (3 September 2020) and promotes the fundamental concept of Te Mana o te Wai, that protecting the health of freshwater protects the health and well-being of the wider environment. The objective of the NPSFM is to ensure that natural and physical resources are managed in a way that prioritises first the health and well-being of water bodies and freshwater ecosystems as the primary obligation of Te Mana o te Wai, above the ability of people and communities to provide for their social, economic, and cultural wellbeing. One of the 6 principles of Te Mana o Te Wai relevant to this plan change is the principle of governance and the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future.
- 4.15 Relevant policies of the NPSFM include Policy 3, which requires that freshwater is managed in an integrated way considering the effects of the use and development of land on a whole-of-

catchment basis and including the effects on receiving environments. Policy 8 requires the significant values of outstanding water bodies to be protected, and Policy 9 requires the habitats of indigenous freshwater species to be protected. Clause 3.5(4) requires every territorial authority to include objectives, policies and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects) of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.

- 4.16 Healthy Waters considers the AUP provisions in E1 requiring an integrated stormwater management approach to be consistent with the NPSFM. Accordingly the NPSFM provides further weight to the expectations for stormwater management promoted by the AUP because it has to be given effect to when considering a plan change, as do the regional policy statement provisions for water quality and integrated management in Chapter E1.
- 4.17 The relevant RPS provisions for stormwater are in Chapter 7.3 Freshwater systems, which seeks that degraded freshwater systems are enhanced (Objective B7.3.1(1)); loss of freshwater systems is minimised (Objective B7.3.1(2)); and adverse effects of changes in land use on freshwater are avoided, remedied or mitigated (Objective B7.3.1(3)). The RPS establishes the framework for integrated management of land use and freshwater that is expressed in the regional plan provisions of Chapter E1. I consider Policy B7.3.2(1)(d) to be particularly relevant because integrated management requires that land use and discharges are controlled to minimise the adverse effects of runoff on freshwater systems.

Stormwater devices

- 4.3 Details around stormwater devices is a matter for the subdivision process. However, a concern that Healthy Waters has raised with the applicant is the number of raingardens identified in the road as part of the subdivision. While it is acknowledged that the subdivision provisions provide sufficient matters of discretion to consider whether stormwater management approach is consistent with an approved SMP or Network Discharge Consent Healthy Waters notes that an SMP has not yet been accepted for adoption into the Network Discharge Consent and so there is a lack of congruity between what is identified as management measures in the plan change and what is being detailed in the subdivision infrastructure report by Maven.

5.0 Submissions

- 5.1 There are several submissions that raise stormwater issues.

- *Casey Norris [2.1]* seeks to decline the plan change as it will directly affect the submitters property outlook, value, sun light, drainage, as well as concerns regarding traffic management.

The submitter's property at 3/516 Great South Road is adjacent to the plan change area. In relation to drainage, this property is subject to an overland flow path that drains to 21 Gatland Road.

The SMP identifies the overland flow paths and identifies that they will remain unobstructed to convey runoff safely within the plan change area including maintaining all existing entry and exit points. Therefore, the overland flow path from the submitter's property would be maintained.

Chapter E12 Land disturbance and Chapter E38 Urban subdivision require the maintenance of overland flow paths. Specifically:

- Standard E12.6.2(12) requires earthworks within overland flow paths to maintain the same entry and exit point at the boundaries of a site and not result in any adverse changes in flood hazards.
- Standard E38.6.5 requires all subdivision to be designed to incorporate overland flow paths on the site.

Recommendation

Existing plan provisions adequately address the submitters concerns regarding drainage. Therefore, no recommended amendments are proposed to the plan change.

- *Judy and Peter Coleman [5.1]* do not support the plan change because the submitter is concerned that the area to the east of Great South Road from Coulthard Terrace (north of the plan change area) to the Slippery Creek bridge is an area that needs to be considered as a whole. The submitter identifies that all the stormwater eventually heads to Slippery Creek, which is unstable and highly prone to erosion and hydraulic properties. The creek and the immediate environs sustain ecosystems including fauna and flora such as totaras and native eels, and children also swim in the creek. The protection of this ecosystem (which is the waterway in this catchment) is paramount.

The submitter also identifies that the connecting road at the bottom of Gatland Road has been ill considered as this road will be eroded in every creek overflow (and there can be 7 overflows in any one year), where the water flows at dangerous speeds and would require further infrastructure to address this issue.

Healthy Waters agrees with the submitter that the wider area needs to be considered when assessing the stormwater effects of the plan change. Healthy Waters is satisfied that the SMP adequately achieves this, including stormwater mitigation measures. However, as identified above the plan change itself does not adequately ensure that the management approach can be implemented.

It is unclear from the submission whether the connecting road at the bottom of Gatland Road identified is within the plan change area. Flooding risks have been addressed in the SMP and no issues have been identified within the plan change area in terms of flood risks on the proposed road network. It appears that the submitters concerns relate to flood risks beyond the plan change area. The flood assessment in the SMP provided for the plan change confirms that there will be no increased flood risks downstream.

Erosion issues within Slippery Creek from the plan change area have been addressed within the SMP, which proposes hydrology mitigation at-source and discharging to the receiving environment via green outfalls to minimise stream disturbance and outfall velocities to reduce erosion impacts.

Recommendation

To address the submitters concerns regarding stream erosion it is recommended that the SMAF 1 Control be applied to the plan change area and precinct provisions are proposed to implement the stormwater management approach proposed by the SMP.

- *Ngati Te Ata [8.1]* seeks to reject the plan change on the basis that there has been a lack of iwi consultation, engagement and consideration of the submitter's cultural preferences. The lack of consultation has resulted to the lack of incorporation of Mana Whenua principles into freshwater solutions on the site, including riparian reserves and public access open space in stormwater management areas. The submitter indicates that the iwi has found the issues around stormwater concerning because the provided stormwater management plan has not addressed the cultural and environmental sensitivity of Slippery Creek adequately.

Section 6.3 of the AEE indicates that iwi (including Ngati Te Ata) did not have issues with the rezoning proposal but would like to be engaged as the development progresses. Therefore, the AEE indicates that this would be addressed through the resource consent.

The revised SMP addresses Mana whenua matters in section 4, identifying the commitments to stormwater management in the subdivision consent for 520 Great South Road to demonstrate mitigation of effects.

As discussed above, Healthy Waters supports in principle the treatment train approach proposed for the plan change. However, Healthy Waters agrees with the submitter that there are further opportunities for incorporating Mana Whenua principles into freshwater solutions including stormwater management. In particular, issues around water quality treatment are not adequately addressed by the plan change and therefore there may be potential adverse effects on Slippery Creek unless precinct provisions are proposed.

Recommendation

It is recommended to include precinct provisions requiring water quality treatment for the plan change area, including appropriate objective, policy, standard and assessment criteria to protect and enhance water quality of the receiving environment.

- *Lee & Gary Running [9.2]* supports the plan change and associated appendices but has some concerns that consideration be given to the future capacity and access to stormwater connections from existing surrounding sites.

The submitter owns two adjacent properties at 9 and 11 Gatland Road that will be developed in the future and wants to ensure infrastructure provides for future connection. The sites are currently zoned Residential – Mixed Housing Suburban. The existing sites are 3791m² and 1012m², and already contain residential development with public stormwater available in Gatland Road. As such any future development will be required to address stormwater management in accordance with the AUP as part of a subdivision or resource consent. There is no requirement for the plan change to provide sufficient capacity for the future development of adjacent sites.

Recommendation

There are no recommendations in response to this submission.

6.0 Conclusions and recommendations

- 6.1 The plan change is required to give effect to both the NSPFM and the Regional Policy Statement provisions of the AUP, specifically the objectives and policies in B7.3 Freshwater systems.
- 6.2 Healthy Waters considers the applicant to have provided sufficient information to consider stormwater effects. The treatment train approach is consistent with the direction and framework of the AUP for integrated stormwater management (Chapter E1). However, the quality of the revised SMP does not meet the requirements of Schedule 4 and therefore it is not adopted in principle under the regional NDC.
- 6.3 The plan change is not considered to be consistent with the AUP regional objectives and policies, and does not give effect to the Regional Policy Statement because it does not control land use and discharges to minimise the adverse effects of runoff on freshwater systems (Policy 7.3.2(1)(c)) by implementing the stormwater management approach proposed by the SMP.
- 6.4 In accordance with the requirements of section 32AA it is necessary to consider appropriate alternatives. The reasonably practicable alternatives (options) considered to achieve the proposed stormwater management approach are, 1. that proposed by the plan change (to rely on the existing provisions), or 2. implement precinct provisions. A comparison of these two options against the key outcomes proposed by the SMP is provided in Appendix 1.
- 6.5 In accordance with section 32AA the following evaluation is provided:
 - a. The proposed precinct provisions are considered to be the most appropriate method to achieve the objectives of the AUP for stormwater management from greenfield development and implement the approach promoted by the plan change's SMP. Relying on the existing AUP provisions is not effective because it will not ensure that the stormwater management approach of SMP to achieve hydrology mitigation in accordance with SMAF 1 and quality treatment of all impervious surfaces is implemented.
 - b. Precinct provisions are effective because greater is provided to both applicant and resource consent planner of the requirements for quality treatment. Provisions require treatment to be achieved or an alternative approach to be assessed as a restricted discretionary activity allowing appropriate consent conditions to be imposed implementing the SMP. Permitted standards are an efficient method for ensuring stormwater management because no additional consents are required.
 - c. There are no additional costs because the precinct provisions implement the approach proposed by the SMP therefore these are already anticipated by the plan change. Permitted

standards ensure that no additional consents are triggered, unless deviating from the proposed management approach. Benefits are better environmental outcomes of implementing the stormwater quality treatment to minimise the generation and discharge of contaminants into the sensitive receiving environment.

- d. The risk of not acting is to rely on the existing AUP provisions, resulting in a lack of quality management and discharge of contaminants into the sensitive receiving environment. There is no risk of acting

6.6 Overall, Healthy Waters supports the plan change subject to the amendments to implement precinct provisions as set out in Appendix 2 to address the concerns raised in submissions 5.1 and 8.1.

Appendix 1 – Assessment of options for implementing the stormwater management approach

<i>Stormwater management approach proposed in SMP</i>	<i>Option 1 – Rely on existing provisions of AUP</i>	<i>Option 2 – Precinct provisions</i>
1. Quality treatment – inert building materials for residential roofs	E9 manages contaminants from high contaminant generating roads (none proposed in the plan change area).	Objectives and policies required to set out the requirement for a treatment train approach to stormwater management including hydrology mitigation and quality treatment of 100% of impervious surfaces because of the sensitive receiving environment.
2. Quality treatment – local roads and JOALs	No ability to require inert building materials or treatment of local roads. Limited ability to manage devices in the road. No ability to require subdivision to be designed in accordance with the SMP or impose appropriate consent conditions.	Permitted activity for new buildings and additions. Restricted discretionary activity for subdivision. Permitted standards for buildings requiring inert building materials for roofs, and full quality treatment of all roads and accessways. Restricted discretionary activity if inert building materials are not utilised, requiring treatment on-site of runoff from roofs. Matters of discretion and assessment criteria for restricted discretionary activities to include stormwater quality treatment for roads.
3. SMAF 1 Control for hydrology mitigation	Rely on existing provisions in E10 by applying the SMAF1 Control and annotating on the AUP planning maps.	-
4. Flooding and overland flow paths	Rely on existing subdivision provisions in E12 Land Disturbance and E38 Urban subdivision to manage flood effects and maintain overland flow paths.	-

Appendix 2 – Proposed precinct provisions

Objective

- Stormwater management to be designed to achieve a treatment train approach for hydrology mitigation and quality treatment to avoid adverse effects of stormwater on the sensitive receiving environment.

Policy

- Subdivision and development achieve stormwater quality treatment of stormwater runoff from all impervious areas within the precinct through inert building materials and GD01 approved devices for other impervious surfaces.
- Ensure stormwater from subdivision and development is managed in accordance with the following drainage hierarchy:
 - a) Retention for reuse;
 - b) Retention via soakage on-site or at-source;
 - c) Detention;
 - d) Conveyance.
- Ensure communal stormwater devices are appropriately located, designed and constructed to minimise the number of devices in roads, contribute to a quality built environment and integrate with open space where practicable.

Rules

- Subdivision (RD) so that additional assessment criteria can apply.
- New buildings and additions to buildings (P) so that standards apply

Permitted standard for building materials

- Building materials
Purpose: To protect water quality in streams, and the Slippery Creek Catchment, by avoiding the release of contaminants from building materials.
 - (1) New buildings, and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that do not have an exposed surface made from contaminants of concern to water quality (i.e. zinc, copper, and lead).

Matters of discretion for restricted discretionary activities

- Stormwater quality treatment.

Assessment criteria for restricted discretionary activities:

Stormwater management

- Subdivision and development is in accordance with the approved Stormwater Management Plan and policies E1.3(1) –(14) and (20(b)).
- A treatment train approach is used to treat runoff from all impervious surfaces so that all contaminant generating surfaces are treated including cumulative effects of lower contaminant generating surfaces.
- Where downstream properties and assets affected by flooding are identified at the time of subdivision flood effects are mitigated by attenuating up to the 100% AEP flood event within the precinct.
- The design and efficiency of infrastructure and devices (including communal devices) with consideration given to the likely effectiveness, lifecycle costs, ease of access and operation and integration with the built and natural environment.
- Adverse effects on Mana Whenua values are avoided, remedied or mitigated.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

22.02.2021

To: Sanjay Bangs Planner, Auckland Council
From: Arun Niravath, Senior Development Engineer

Subject: Private Plan Change – PC52 – Water and Wastewater Assessment

1.0 Introduction

1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to water and wastewater reticulation.

1.2 In writing this memo, I have reviewed the following documents:

- Blue Barn Consulting Engineers- 520 Great South Road Papakura *Engineering Infrastructure Report, Ref- Ld-1910-Rp-2205*, June 27, 2019
- Submission 10- Veolia Water Services [Public Water and Wastewater Network-Service/Utility provider]

2.0 Key Infrastructure Issues

- Capacity constraints in the existing wastewater reticulation and upgrades may be needed to existing infrastructure
- Further modelling is required to assess the water supply for the proposed development and determine suitability or if upgrades are required.

3.0 Applicant's assessment

Wastewater

The applicant has proposed a gravity servicing for majority of the future residential lots and low-pressure servicing for few lots, which cannot be serviced by gravity.

The applicant may need a pump station and may need to upgrade the existing pump station (Slippery Creek, WWPS). This is a high-level assessment. As the finer details or assessment is not provided, the applicant should work together with the service/utility provider to determine the necessary upgrades and carry out the required infrastructure work to service the future residential development. The lots with low pressure system will need to be specifically worked through with the service/utility provider. I believe that a suitable design can be reached at the detailed design stage.

Water

The applicant advises that the existing water supply network will be extended to service the current development. As part of the review process Veolia Water (service/utility provider) has requested to provide the existing water network modelling analysis to determine suitability or if upgrades are required. I believe that this information is needed to assess the capacity and these details should be provided.

4.0 Assessment of Infrastructure effects and management methods

Need to address:

- The existing water network requires a modelling analysis to determine suitability or if upgrades are required.
- Upgrades to the Slippery Creek WWPS, receiving network and catchment will require upgrades.

5.0 Submissions

- Submission 10- Veolia Water Services [Public Water and Wastewater Network-Service/Utility provider]. Comment on Veolia's submission points is provided below.

(Submission 10.1) Existing water infrastructure is modelled to ensure sufficient capacity. Should there be insufficient capacity, it is the responsibility of the Applicant to, at its cost, design and construct required network infrastructure upgrades.

- Comment- the report provided from the applicant is a high level one. These assessments and details should be provided at the future development stage (ideally subdivision) to ensure that residential lots can be adequately serviced.

(Submission 10.2) Wastewater disposal from the Plan Change Area is required to be connected to the public wastewater network, discharging to the Slippery Creek Wastewater Pump Station, Motorway Wastewater Pump Station and across State Highway 1 to the Hingaia Wastewater Pump Station.

- Comment- the applicant should work together with the Asset Manager to integrate the new infrastructure required with the existing one.

(Submission 10.3) The Applicant will, at its cost, design and construct:

- i. any wastewater infrastructure required to enable the connection of the Plan Change Area to the public wastewater disposal and collection system
- ii. any water infrastructure required to enable the connection of the Plan Change Area to the public retail water network

- Comment- It is the applicant's responsibility to provide the necessary infrastructure for the development. I understand that these will be requirements of any future development or subdivision in accordance with the AUP(OP).

(Submission 10.4) The Applicant obtains approval from Veolia for the connection points to the local network to service the Plan Change Area.

- Comment- it is applicant's responsibility to obtain the necessary approval from respective service or utility managers, prior to any related works.

6.0 Conclusions and recommendations

- There is further assessment required to determine that if there is sufficient network capacity to service the future residential development. The applicant has to work with the service/utility provider and ensure that there is adequate capacity in water and

wastewater reticulation to service the future residential development. The applicant should carry out the necessary upgrades required to the network.

- I concur with Veolia's assessment that further information is required on water capacity, and with remainder of their decisions requested under section 3 of the submission.
- Overall recommendation – I can support the proposed private plan change subject to the applicant carrying out additional assessment and necessary infrastructure upgrades.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

19 March 2021

To: Sanjay Bangs, Policy Planner, Auckland Council
From: Shane Lander, Principal Geotechnical Engineer, Lander Geotechnical Consultants Limited

Subject: Private Plan Change – PC52 520 Great South Road, Papakura – Geotechnical Assessment

1.0 Introduction

1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to geotechnical effects.

I hold a NZCE (Civil) and BE (Civil; Hons 1st class, 1st div) and am a Chartered Professional Engineer. My work experience includes significant land subdivisions across South Auckland over the past 20 years on steep and/ or compressible ground. I hold the position of Managing Director and Principal Geotechnical Engineer at Lander Geotechnical Consultants Limited based in Manukau.

1.2 In writing this memo, I have reviewed the following documents:

- Geotechnical Report, ENGEO Ltd, Ref No 15932.000.000_02, dated 2 July 2019
- Response to RFI, ENGEO Ltd, Ref No 15932.000.000_04, dated 14 May 2020
- Second Response to RFI, ENGEO Ltd, email dated 17 June 2020

2.0 Key geotechnical issues

The key geotechnical issues associated with Plan Change 52 are:

- Geological setting and ground conditions for the site, including an assessment of natural features and geohazards that may affect future residential development upon the land.
- Geotechnical guidance for future earthworks based on the ground conditions likely to be encountered during site stripping and bulk cut operations.
- Broad suitability of the site to safely support typical residential structures for likely subdivisional concepts.
- Available aerial photographs infer fills or land modification may have occurred in the watercourse at the eastern corner of the site.
- No investigations have been undertaken in the low-lying shallow watercourse feature, and if fills are to be placed in the lower lying areas, the suitability of the ground here to receive associated fill surcharges needs to be better understood.

3.0 Applicant's assessment

The applicant geotechnical engineer (ENGEO Ltd) have assessed based on their desktop review of available information and the findings of site investigations, that:

- The site (520 Great South Road, Papakura) is not subject to erosion, significant subsidence (including liquefaction), falling debris, slippage or inundation by soil or rock in accordance with the provision of 106 of the RMA 1991.
- Typical foundations for buildings would fall within NZS3604 solutions, with consideration to expansive soils (in this case AS2870 Class M).
- Land development works for future subdivision should be undertaken in accordance with NZS4404 and Auckland Councils Code of Practice for Land Development and Subdivision (ACCoP)

4.0 Assessment of geotechnical effects and management methods

ENGEO Ltd have assessed that:

- Geotechnical effects associated with land modification works (i.e. earthworks cuts and fills to create a residential subdivision) are best managed as part of the Resource Consent process, specifically once earthworks models are developed and able to be assessed. This phase of work may involve further site investigations commensurate with the nature of the final development scheme / earthworks plans. These assessments would generally be in accordance with the ACCoP.
- This phase is subsequent the Private Plan Change and I concur with this.

In my view:

- The applicant has undertaken sufficient preliminary ground proving investigations and adequately assessed the private plan change effects on the environment related to geotech effects, in that the key hazards as outlined by Section 106 of the RMA have been considered and dismissed
- Key geotechnical issues relating to the presence of existing fills and/ or land modifications in the easter corner of the site, and/ or the effects of filling in the low lying portions of the site have not yet been assessed in detail, nor the overall response to bulk earthwork elsewhere on the site. However, it is sensible to consider these aspects only once the nature of final development works are known.
- I recommend that further Geotechnical assessments are undertaken part of a Resource Consent process, commensurate with the nature of land modification earthworks and/ or scheme plan. This would need to consider development within, or in close proximity to, the eastern corner of the site and/ or low lying portions of the site which have not been investigated or assessed as part of the Private Plan Change study. Further investigations would probably be warranted to prove ground conditions in these areas, should development plan to extent into such areas.

5.0 Submissions

No submissions relate to geotechnical matters.

6.0 Conclusions and recommendations

- For the reasons outlined in this memo, in my view there are no insurmountable Geotechnical hazards rendering the land unsuitable for the proposed Private Plan Change.

Memo (technical specialist report to contribute towards Council's section 42A hearing report)

20th April 2021

To: Sanjay Bangs, Policy Planner, Auckland Council

From: Ashleigh Richards, Parks, Sport and Recreation, Auckland Council

Subject: Private Plan Change – PC52 Parks, Sport and Recreation Assessment

1.0 Introduction

- 1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to Parks Sport and Recreation (PSR) effects.
- 1.2 I hold a Master of Resource and Environmental Planning from Massey University (2013) and a Bachelor of Science from Waikato University (2009) majoring in Chemistry.
- 1.3 I have 7 years of experience in environmental planning, parks planning and project management. I have been employed by Council in the Parks Planning team since September 2019. During that time I have gained experience implementing regulatory plans by providing parks specialist input to the subdivision process.
- 1.4 In writing this memo, I have reviewed the following documents:
 - 01 Planning and Section 32 Report
 - 02 Appendix 1 Plan Change Zoning Map
 - 05 Appendix 4 RPS Objectives and Policies Assessment Table
 - 06 Appendix 5 Urban Design Assessment
 - 14 RFI Response Planning

Auckland Council Documents referred to include:

- Drury-Opāheke Structure Plan
- Papakura Greenways: Local Paths Plan (2017)
- Open Space Provision Policy 2016
- Southern Structure Plan Area Neighbourhood Design Statement Revision B Drury-Opāheke and Pukekohe-Paerata 2019

2.0 Key Parks, Sport and Recreation Issues

- 2.1 The key issues relating to parks, sport and recreation are:
 - Whether the provision of open space to support the plan change aligns with Auckland Council Open Space Provision Policy 2016 and structure plans.
 - Vesting of the drainage reserve shown in the masterplan supporting the plan change
 - The interface with open space including the Papakura South Cemetery.

3.0 Applicant's assessment

- 3.1 The Section 32 Assessment report prepared by Barker and Associates has a diagram (figure 5) on page 21 that shows how the development within the plan change area could integrate within the surrounding development. On the plan shown at figure 5, where the stormwater treatment/esplanade area is indicated there is a pedestrian cycling connection opportunity on the boundary of the site with the Papakura South Cemetery.

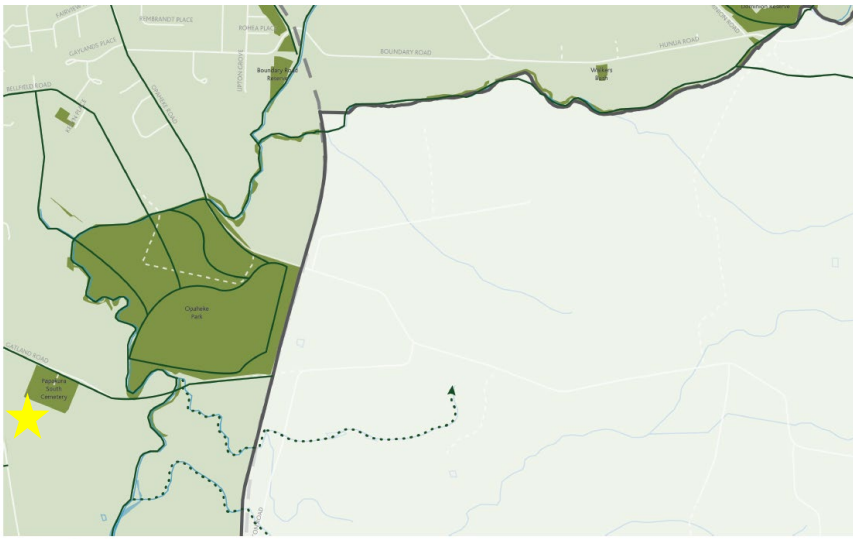


Figure 5: Showing how development within the Plan Change area can integrate successfully with the likely form of surrounding development in the future.

4.0 Assessment of Parks, Sport and Recreation effects and management methods

Greenways

- 2.1 The Papakura Greenways Plan Sept 2017 does not identify a greenways connection through the Plan Change site, relying instead on Gatland Road on-road connection to the north of the Papakura North Cemetery. The greenways plan is limited in its scope at this stage until the area fully develops. It would be supported if an additional greenway route was secured to add to the proposed walkway network connecting to the Slippery Creek esplanade reserve network.
- 2.2 An additional greenway route is also supported by the Drury-Opaheke Structure Plan, which, with the outcome of protecting and enhancing the blue-green network that supports the area, identifies a connection from the subject site, alongside the southern boundary of the cemetery, and on towards the slippery creek esplanade reserve – see figure 2 below.



29 September 2016
 Figure 1: Greenways Plan with subject site indicated by a star.

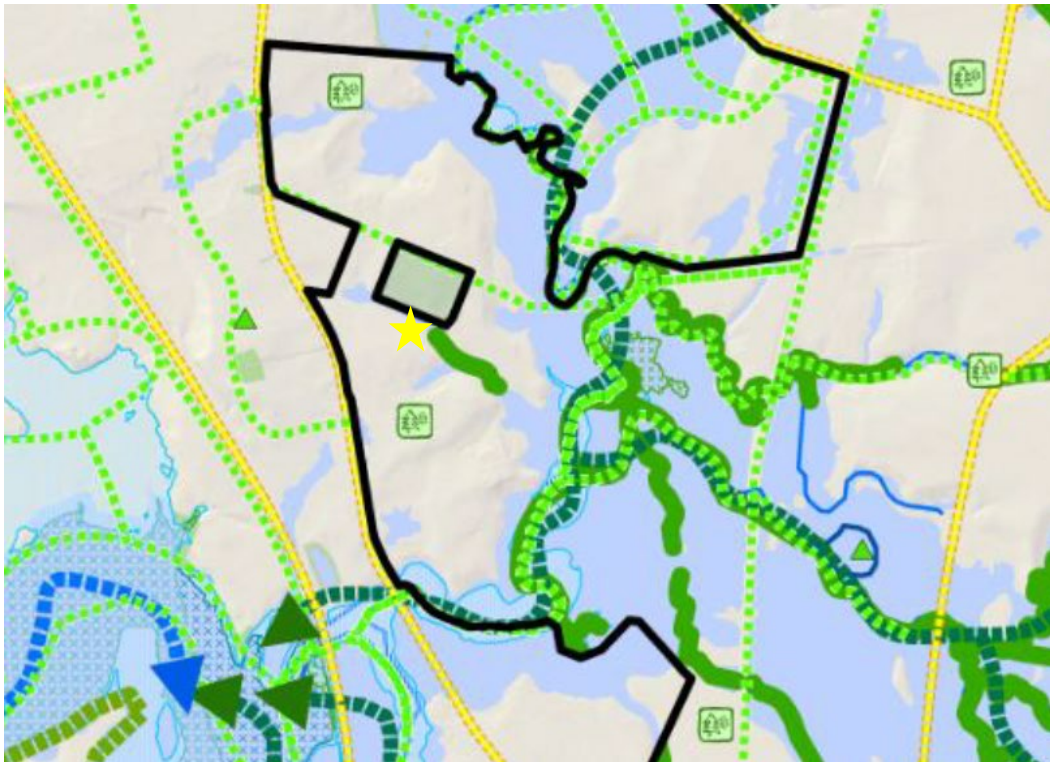


Figure 2: Drury-Opaheke Structure Plan Blue-green Network Map with subject site indicated by a star.



Figure 3: Southern Structure Plan Area Neighbourhood Design Statement Drury-Opāheke and Pukekohe-Paerata 2019 with subject site indicated by a star.

Open Space demand

- 4.1 No open space zoning is proposed within the Plan Change. The urban design assessment by Barker and Associates, at page 23, notes the Drury Opaheke Structure Plan identifies the requirement for two new neighbourhood parks in the vicinity of the site, and that an analysis of the wider area has shown that these would most logically be located outside of the site.
- 4.2 This assessment is in accordance with the Auckland Council Open Space Provision Policy 2016, and the structure plans shown in figures 2 and 3, which require no additional open space to support the proposed rezoning of the Plan Change Area to a medium density residential area, as Opaheke Sports Park and Parkhaven Reserve provide both a neighbourhood park within 400m walk and a suburb park within 1000m walk. Furthermore, this has been confirmed by Ezra Barwell, Senior Policy Advisor, Community Investment and no further assessment of open space is provided.

It is noted that there is currently no direct access from the subject site to the suburb park through Gatland Road as the eastern section is unformed. However, the structure plans anticipate the provision of suburb level open space for the Plan change site will be met when the future connection is made. As such, the location of future neighbourhood Parks outside of the plan change site is supported by Parks given this is consistent with the Open Space Provision Policy 2016, the Drury-Opāheke Structure Plan and the Southern Structure Plan Area Neighbourhood Design Statement. Esplanade, riparian and stormwater reserves

- 4.3 The Section 32 Assessment report prepared by Barker and Associates has a diagram (figure 4) on page 20 that shows where the stormwater treatment/esplanade area is indicated over a permanent stream tributary of Slippery Creek. This is not formalised by Open Space zoning, rather would rely on future resource consents to vest this area of land.
- 4.4 This is supported by Parks Planning to provide a greenways link from the site to the future esplanade network that will connect into the Slippery Creek Esplanade Reserve. Furthermore, this will provide a buffer between the subject site and the Papakura South Cemetery, reducing reverse sensitivity effects. Healthy Waters will have to accept this land at resource consent stage and have indicated acquiring this land may be supported.

Interface with existing open space

- 4.5 The site adjoins Papakura South Cemetery. Ms Rosie Stoney, Senior Service Development Specialist, Cemetery Services, has noted that reverse sensitivity around cemetery use and

development is a concern with development adjoining cemetery land. Council has a legal obligation to ensure there is suitable provision of cemetery land for the burial of bodies under the Burial and Cremation Act 1964. Cemetery Services would like to ensure there are suitable buffers along the boundary of the development, particularly on the western side of the cemetery. Planting along the cemetery boundaries in particular needs to be selected mindfully as big trees with expansive root systems can over time encroach on graves, damage concrete burial beams, and damage headstones.

Regulatory Framework

4.6 The regulatory framework for Parks, Sport and Recreation assessment is set out within the below regulatory mechanisms, with key points noted:

- The Resource Management Act 1991, which at s229 and 230 requires the provision of esplanade reserves for the purposes of protecting conservation values, and enabling public access and recreational use to or along any sea, river, or lake.
- The National Policy Statement Urban Development (NPSUD) which at Policy 2.2, requires urban environments have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.
- The National Policy Statement for Freshwater Management (NPSFM) which, at Policies 6 and 7 require that there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted, and the loss of river extent and values is avoided to the extent practicable.
- The Auckland Regional Policy Statement, which at B2.7.1 and B2.7.2 requires that recreational needs of people and communities are met through the provision of a range of quality, connected, accessible open spaces and recreation facilities. At B7.3 and B7.4, the RPS requires the maintenance and enhancement of freshwater through integrated management.
- The Auckland Unitary Plan framework, in particular:
 - Open Space Zone – Objective H7.2.(1) Recreational needs are met through the provision of a range of quality open space areas that provide for both passive and active activities and (2) The adverse effects of use and development of open space areas on residents, communities and the environment are avoided, remedied or mitigated.
 - Subdivision Urban - Objective E38.2.3 Land is vested to provide for esplanades reserves, roads, stormwater, infrastructure and other purposes.

Methods proposed to manage adverse effects

4.7 The Plan Change relies on the Residential – Mixed Housing Urban zoning to manage the adverse effects of the development on open space. Given the above discussion, an area of drainage reserve adjoining the southern boundary of the cemetery is supported. Healthy Waters have noted support for drainage reserve however this decision would be finalised at resource consent stage.

4.8 Zoning the area indicated as drainage reserve Open Space is not recommended as this needs to be assessed with any subdivision application. The area should be changed to open space zoning after any proposed subdivision on the site.

5.0 Local Board views

5.1 An assessment of Local Board views in relation to parks and open spaces is provided in Table 1 below:

Table 1: Papakura Local Board views assessment

Matter	Local Board views	Assessment
Green Space / Play Space	v) This will be an intensive development with minimal outside play area for the children within the residential sites. It is likely many children will live in this development.	Support community green space within the development, though only as appropriate drainage reserve negotiated with Healthy Waters and Parks, which provides a pedestrian link to wider open space network.
	vii) Ensure there is close by green space where children have an area to kick a ball around and utilize play equipment.	Support, there is open space with a playground and kickabout space at Parkhaven Drive approximately 200m walk from the boundary of the subject site.
	viii) The local board has an expectation that the developer would provide reserve area that includes multi-generational opportunities such as adult fitness equipment or exercise stations as well as play equipment as it is not close to any other facilities. This reflects the Local Board Plan 2020 advocacy point relating to developers funding the development of playgrounds in line with council standards.	Support developers funding the provision of multigenerational recreation; however the Open Space Provision Policy 2016 does not support provision of neighbourhood reserves within the plan change site. Such assets are generally not appropriate within local purpose (drainage) reserves, though some may be able to be incorporated in consultation with Healthy Waters.
	x) Ensure there is a green space for a community garden that has room for a shed for storage of community tools.	Support, though this is not in line with policy direction for this site and should be provided privately.
	xi) The board does not consider the Gatland Road Cemetery to be an open space for recreation purposes.	Support, Gatland Road Cemetery is for cemetery purposes and appropriate buffers between residential and cemetery uses should be provided to ensure reserve sensitivity does not occur. This can be assessed at Resource Consent stage, though could also be achieved through zoning of the drainage reserve as open Space at Plan Change Stage.

6.0 Submissions

6.1 An assessment of submitter views in relation to parks and open spaces is provided in Table 2 below:

Table 2: Submission assessment

Sub #	Sub point	Submitter	Theme	Summary	Response
6	6.3	Priyanka Hulikoppe	Opposes	Seeks that there be some open space (gaps) between urban and suburban zones.	Support appropriate open space between zones, though only as appropriate drainage reserve negotiated with Healthy Waters and Parks.
7	7.2	Julia Marr	Supports	Seeks for less dwellings to allow for community space within this new development and more parking.	Support community green space within the development, though only as appropriate drainage reserve negotiated with Healthy Waters and Parks.
14	14.3	David and Sarah Bryant	Opposes	Establish continuous safe pedestrian access to nearby Town Centre's including pedestrian crossings.	Support a pedestrian greenways link within the development through the drainage reserve.

7.0 Conclusions and recommendations

- It is my conclusion that the assessment provided by the applicant is acceptable in terms of Parks, Sport and Recreation outcomes anticipated by Auckland Council policies and plans direction and framework of the AUP.
- The private plan change does not propose any public open space and this is consistent with policy direction for this site.
- A connected and integrated open space system can be achieved in later resource consent processes.

APPENDIX 6
PROPOSED MODIFICATION TO PC52

1. Apply the Stormwater Management Area – Flow control to the PC52 site on the Auckland Unitary Plan maps
2. Introduce a new precinct, as outlined below.

Ixx. Gatland Road X Precinct

Ixx.1. Precinct Description

The Gatland Road X Precinct applies to 4.63ha of land in Papakura.

The purpose of this precinct is to manage adverse stormwater quality and quantity effects on the receiving environment, and to ensure that subdivision and development provides for the necessary transport infrastructure.

The zoning of land within this precinct is Residential – Mixed Housing Urban Zone.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

Ixx.2. Objectives [rp/dp]

- (1) Stormwater quality and quantity is managed to avoid adverse effects on the receiving environment.
- (2) Subdivision and development is supported by appropriate transport infrastructure and provides for the safe and efficient operation of the current and future transport network.

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

Ixx.3. Policies [rp/dp]

- (1) Require subdivision and development to achieve stormwater quality treatment of stormwater runoff from all impervious areas within the precinct through inert building materials and devices designed in accordance with GD01 for other impervious surfaces.
- (2) Require stormwater from subdivision and development to be managed in accordance with the following hierarchy for hydrology mitigation:
 - a) Retention for reuse;
 - b) Retention via soakage on-site or at-source;
 - c) Detention;
 - d) Conveyance.

- (3) Ensure that communal stormwater devices are located, designed and constructed to minimise the number of devices in roads, contribute to a quality built environment and integrate with open space where practicable.
- (4) Require subdivision and development to provide for a transport network that:
- a) Enables Great South Road to be widened in the future;
 - b) Delivers an urban standard of frontage to Great South Road, including at a minimum, footpaths and pedestrian connectivity, kerbs and street lighting.

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

Ixx.4. Activity table [rp/dp]

All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table IX1.4.1 below.

Activity Table IX.4.1 specifies the activity status of subdivision and discharges of contaminants into air, or onto or into land or water activities in the Gatland Road X Precinct pursuant to sections 11 and 15 of the Resource Management Act 1991.

Table Ixx.4.1 Activity table

<u>Activity</u>		<u>Activity status</u>
<u>Development</u>		
(A1)	<u>New buildings and additions to buildings</u>	
<u>Subdivision</u>		
(A2)	<u>Subdivision</u>	

Ixx.5. Standards

All relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IX.4.1.

All activities listed in Activity Table IX.4.1 must also comply with Standard IX.5.1.

Ixx.5.1. Building materials

Purpose:

- To protect water quality in streams, and the Slippery Creek Catchment, by avoiding the release of contaminants from building materials
- (1) New buildings, and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that do not have an exposed surface made from contaminants of concern to water quality (i.e. zinc, copper, and lead).

Ixx.6. Assessment – restricted discretionary activities

Ixx.6.1. Matters of discretion

The Council will reserve its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

- (1) Subdivision:
 - (a) Stormwater management
 - (b) Safe and efficient operation of the current and future transport network
- (2) Infringements to Standard Ixx.5.1. Building materials
 - (a) Stormwater quality

Ixx.6.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

- (1) Subdivision
 - (a) Stormwater management
 - i. The extent to which subdivision:
 - Is in accordance with the approved Stormwater Management Plan and Policies E1.3(1) – (14) and (20)(b).
 - Implements a treatment train approach to treat runoff from all impervious surfaces so that all contaminant generating surfaces are treated including cumulative effects of lower contaminant generating surfaces.
 - Mitigates flooding effects on downstream properties and assets affected by flooding, by attenuating up to the 100% AEP flood event within the precinct.
 - ii. The design and efficacy of infrastructure and devices (including communal devices) with consideration given to the likely effectiveness, lifecycle costs, ease of access and operation and integration with the built and natural environment.
 - (b) Safe and efficient operation of the current and future transport network
 - i. Whether subdivision provides for a setback from Great South Road to enable future road widening, consistent with the existing road boundary to the north and south of the Precinct.

- ii. Whether the frontage along Great South Road is designed and constructed to an urban standard, including at a minimum footpath, connectivity to the footpath network on the western side of Great South Road, front and rear berms, and street lighting.

(2) Infringements to Standard Ixx.5.1 Building materials

(a) Stormwater quality

- i. The extent to which development:
 - Is in accordance with the approved Stormwater Management Plan and Policies E1.3(1) – (10) and (12) – (14).
 - Implements a treatment train approach to treat runoff from all impervious surfaces so that all contaminant generating surfaces are treated including cumulative effects of lower contaminant generating surfaces.

I1.1. Special information requirements

There are no special information requirements in this precinct.

I1.2. Precinct plans

There is no precinct plan for this precinct.

APPENDIX 7

COUNCIL DECISION TO ACCEPT PC52 UNDER CLAUSE 25 TO FIRST SCHEDULE RMA

Private plan change from 520 Great South Road Limited at 520 and 522 Great South Road and 21 Gatland Road, Papakura

Clause 25, Schedule 1, Resource Management Act 1991



Te take mō te pūrongo

Purpose of the report

1. To decide under Clause 25 to Schedule 1 of the Resource Management Act how to process a private plan change request to the Auckland Unitary Plan from 520 Great South Road in relation to 4.63ha of land at 520 and 522 Great South Road and 21 Gatland Road, Papakura.

Whakarāpopototanga matua

Executive summary

2. This report considers a private plan change request lodged in February 2020 from 520 Great South Limited. The plan change request seeks to rezone 4.63ha of land at 520 and 522 Great South Road and 21 Gatland Road, Papakura from Future Urban zone to Residential – Mixed Housing Urban zone.
3. The plan change request is included as **Attachment A** to this report.
4. Auckland Council must decide how a private plan change request is processed. Under the Resource Management Act 1991¹ the council may either:
 - a) adopt the request as if it were a proposed plan change made by the council, or
 - b) accept the private plan change request in whole or in part, or
 - c) reject the private plan change request in whole or in part, if one of the limited grounds for rejection is satisfied, or
 - d) deal with the request as if it were an application for a resource consent, or
 - e) a combination of options a) to c).
5. There is a potential ground for rejection under Clause 25(4)b), in that the substance of the request has been considered within the past two years through the preparation of the Drury-Opāheke Structure Plan. However, this is considered to be a weak ground for rejection given the structure plan has a strategic focus for the wider Drury-Opāheke area, and does not enable urban development to occur in the manner that a private plan change request does.
6. I recommend that the private plan change request is accepted under clause 25(2)(b) Schedule 1 of the Resource Management Act 1991.

Ngā tūtohunga

Recommendation/s

7. That the Manager Planning – Central and South Planning, having had particular regard to the applicant's section 32 evaluation report, accepts the private plan change request by 520 Great South Road Limited, included as Attachment A, pursuant to clause 25(2)(b) Schedule 1 Resource Management Act 1991, for the following reasons:
 - a. The applicant's section 32 evaluation report considers different options, including a do nothing approach, rezoning the plan change area as Mixed Housing Suburban, and rezoning the area as Mixed Housing Urban. This report considers that the option put

¹ Clause 25, Schedule 1, Resource Management Act 1991.

forward in the plan change proposal is the most appropriate to achieve the purpose of the Resource Management Act 1991.

- b. Accepting the private plan change request enables the matters raised by the applicant to be considered on their merits, during a public participatory planning process.
- c. It is inappropriate to adopt the private plan change. The private plan change proposal is not a matter under consideration in council's policy work programme. The private plan change does not address a gap in the Auckland Unitary Plan (Operative in Part) 2016, introduce a new policy direction, nor does the private plan change have broad application by seeking to change provisions that apply across the region. The proposed rezoning and precinct amendments relate only to a geographically discrete area and does not include provisions that fundamentally differ from the policy direction of the Auckland Unitary Plan (Operative in Part) 2016.
- d. There is one ground on which the private plan change request, as the substance of the request has been considered within the last two years (clause 25(4)(b)) through the identification of the land as Mixed Housing Urban in the Drury-Opāheke Structure Plan. However, this is not considered to be a strong ground for rejection, given that the structure plan takes a strategic view with regard to land use, and does not confer any development rights in a manner that a plan change request does,
- e. The remaining grounds to reject private plan change request under clause 25(4) are limited and no ground is met by this private plan change.
- f. The most relevant consideration is whether the request is in accordance with sound resource management practice under clause 25(4)(c). This is because the plan change request seeks to enable the development of Future Urban zoned land ahead of the sequencing outlined in the Future Urban Land Supply Strategy 2017, which identifies the Drury-Opāheke area as being development ready by between 2028 – 2032.
- g. However, at a coarse merits assessment level, the plan change is considered to be in accordance with sound resource management practice because:
 - i. The proposed Mixed Housing Urban zone is consistent with the land use zoning set out in the Drury-Opāheke Structure Plan 2019.
 - ii. The request would enable the land to be developed ahead of planned transport infrastructure identified by Te Tupu Ngātahi / Supporting Growth Alliance being delivered in Drury. This difference in timing between land use development and infrastructure delivery may be between 2 and 12 years. However, some key transport projects have had funding brought forward by the New Zealand Upgrade Programme, which allocates funding to two Drury rail stations, electrification of the rail track from Papakura to Pukekohe, and State Highway 1 improvements from Papakura to Drury South. In the interim, the traffic associated with the plan change can potentially be accommodated on the surrounding network without the need for substantial improvements. There are also broader considerations of how the early release of this land (relative to FULSS sequencing) could divert funding from infrastructure required to support brownfield development (and thus be inconsistent with the Auckland Plan and Regional Policy Statement). However, the merits of the timing of the plan change relative to funded and planned infrastructure (including the effects on delivery of infrastructure elsewhere in Auckland) can be considered in detail through the submissions and hearings stages of the plan change process;
 - iii. The plan change land is largely located outside of areas identified as being susceptible to flooding effects, particularly those associated with Otuwairoa / Slippery Creek, and the request unlikely to preclude wider flooding mitigations required to urbanise land in Drury-Opāheke;

- iv. The plan change land is contiguous to the existing urban edge, and can likely be serviced by the existing reticulated water and wastewater networks;
 - v. Whilst there is a risk that further plan changes are requested to urbanise land in Drury ahead of the FULSS, these plan changes will likely be confined to the areas that can be serviced by existing infrastructure, and are clear of land subject to flooding constraints.
- h. With regard to the remaining grounds for rejection under clause 25(4):
- i. The request is not frivolous. The applicant provided supporting technical information and the private plan change has a resource management purpose of enabling a more efficient use of the land and more effectively avoiding, remedying or mitigating the adverse effects on surrounding land. The request is not vexatious. The applicant is not acting in bad faith by lodging a private plan change request. The applicant is not requiring council to consider matters in this process that have already been decided or the subject of extensive community engagement or investment.
 - ii. The coarse-grain assessment of the request does not indicate that the private plan change is not in accordance with sound resource management practice. Whether the private plan change request's objectives are the most appropriate way of achieving the promotion of sustainable management will be tested through the submission and hearing processes.
 - iii. The provisions of the Auckland Unitary Plan (Operative in Part) 2016 subject to the private plan change request have been operative for at least two years.
- i. It is not appropriate to deal with the private plan change as if it was a resource consent application because the development of Future Urban zoned land for urban uses ahead of a plan change being approved can be considered contrary to the objectives and policies of the Auckland Unitary Plan (Operative in Part) 2016.
- j. The applicant requested that council accept the private plan change request.

Horopaki

Context

Site and surrounding area

8. The proposed plan change relates to 4.63ha of land at 520 and 522 Great South Road and 21 Gatland Road, Papakura. The plan change land is situated between the Papakura and Drury centres, located approximately 3km south of the Papakura Metropolitan Centre. The plan change land is also located 2km from motorway interchanges at Papakura and Drury, and within 2.5km of the Papakura Train Station (refer to **Figure 1** below)
9. The land is currently primarily held in pasture and accommodates three residential dwellings. The site is contiguous to the urban area of Papakura and adjoins the established low-density residential suburb of Rosehill to the west. The immediate surrounds are also primarily held in pasture, with the exception of the Papakura South Cemetery, which immediately adjoins the plan change land to the northeast.
10. Within the Auckland Unitary Plan, the plan change land is zoned Future Urban Zone (refer to **Figure 2** below), and is subject to the following controls:
 - a) Controls: Macroinvertebrate Community Index – Rural and Urban
 - b) Controls: Arterial Roads²

² Applies to Great South Road which adjoins the plan change land

Figure 1: Site context

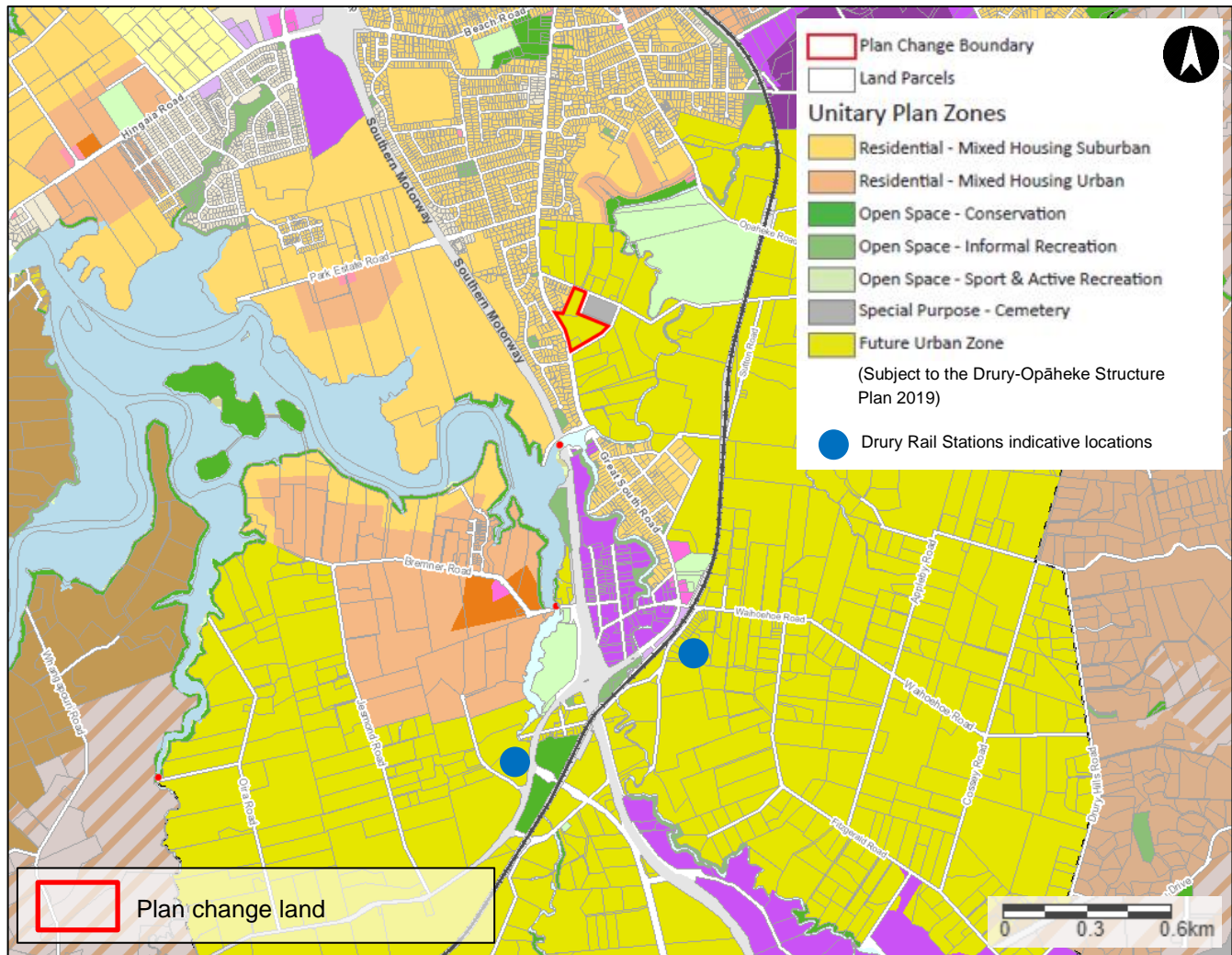
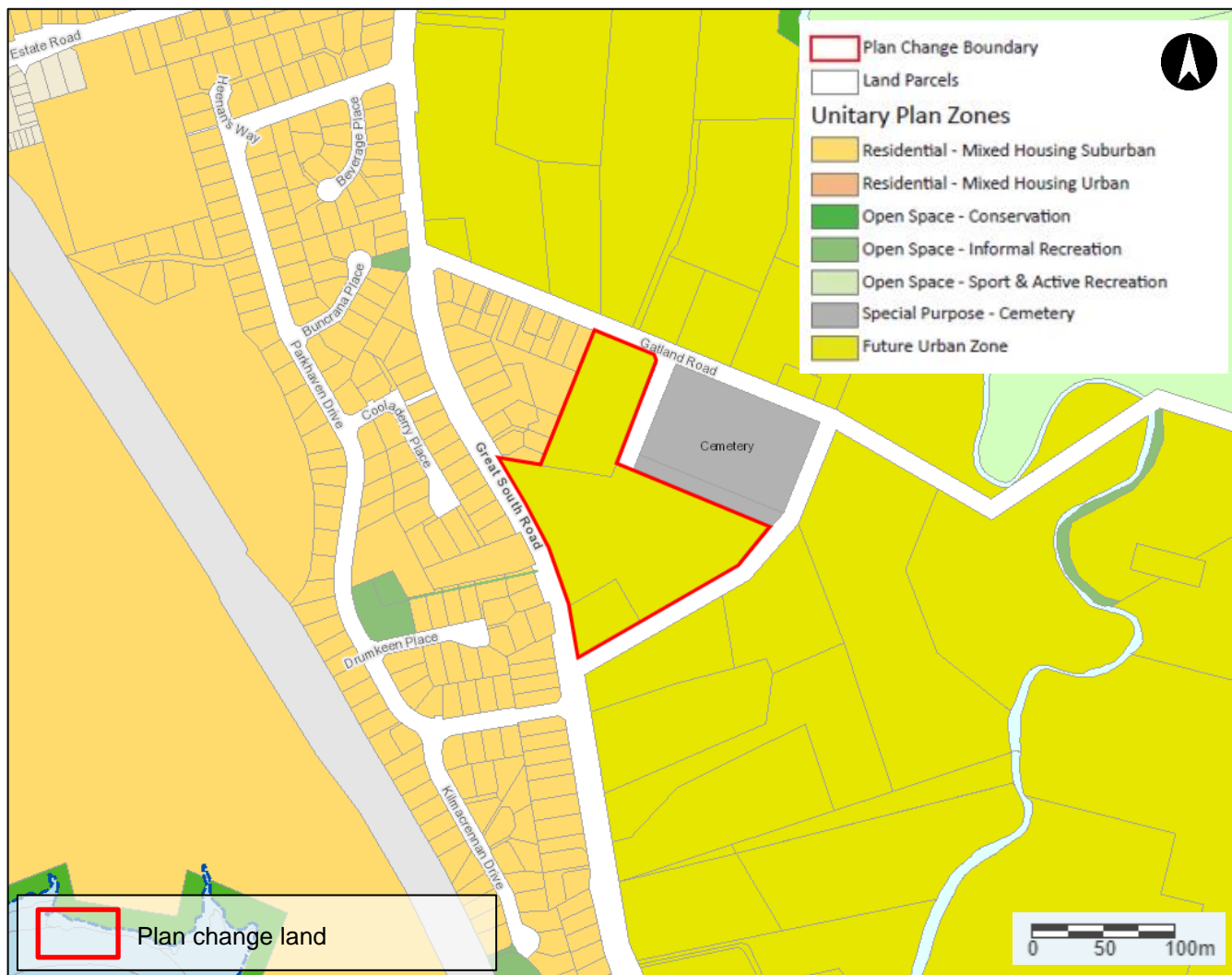


Figure 2: Existing zoning under Auckland Unitary Plan (Operative in Part)



11. The Auckland Plan seeks that most of Auckland's anticipated population and dwelling growth over the next 30 years be within the existing urban area. The remaining development is anticipated to occur in future urban areas and in rural areas. The AUP identifies approximately 15,000 hectares of rural land for future urbanisation with the potential to accommodate approximately 137,000 dwellings and 67,000 jobs.
12. The Future Urban Land Supply Strategy 2017 ('**FULSS**'), sets out the sequencing of future urban land for development within Auckland, and identifies the plan change land and surrounding Drury and Opāheke area east of SH1 as being development ready by between 2028-2032. The reasons provided in support of this timeframe relate to the bulk infrastructure required to service the wider area, including augmenting the Southern and Southwestern wastewater interceptors, and the resolution of complex flooding issues in Opāheke.
13. The Drury-Opāheke Structure Plan 2019 ('**structure plan**') outlines how growth anticipated within this area can be achieved by indicating the location of future land use zonings, infrastructure and constraints within Drury and Opāheke. This includes the location of residential areas, town centres, business areas and critical infrastructure amongst other elements. The land subject to this private plan change request is identified as being Mixed Housing Urban.
14. Through Te Tupu Ngātahi / Supporting Growth Alliance ('**SGA**'), Auckland Transport and Waka Kotahi New Zealand Transport Agency have identified the preferred transport network and

interventions required to support growth in the south. Of particular relevance to this plan change request are the following projects identified by SGA:

- a) A new train station (Drury Central) on the eastern side of SH1;
- b) Electrification of the railway track between Papakura and Pukekohe;
- c) Great South Road developed as a Frequent Transit Network bus route

15. In January 2020, central government announced the New Zealand Upgrade Programme ('**NZUP**'), which allocated funding to transport infrastructure within Drury-Opāheke, amongst other projects. This included:

- a) Fully funding the two new railway stations in Drury Central and Drury West, along with 'park and ride' facilities, with construction of the stations commencing in 2023;
- b) Fully funding the electrification of the railway track from Papakura to Pukekohe, with construction commencing late 2020; and
- c) State Highway 1 Papakura to Drury improvements, including three-laning the state highway and upgrading the Drury interchange, to be completed by 2025.

16. Resource consents for the subdivision and development of 520 Great South Road³ and 21 Gatland Road⁴ have also been lodged with Council, the former being lodged by the applicant for this plan change request. These include a resource consent to develop 102 dwellings at 520 Great South Road, and a resource consent for 20 dwellings at 21 Gatland Road. The intensity and form of the development sought by way of the resource consent applications broadly align with the zoning sought by this plan change.

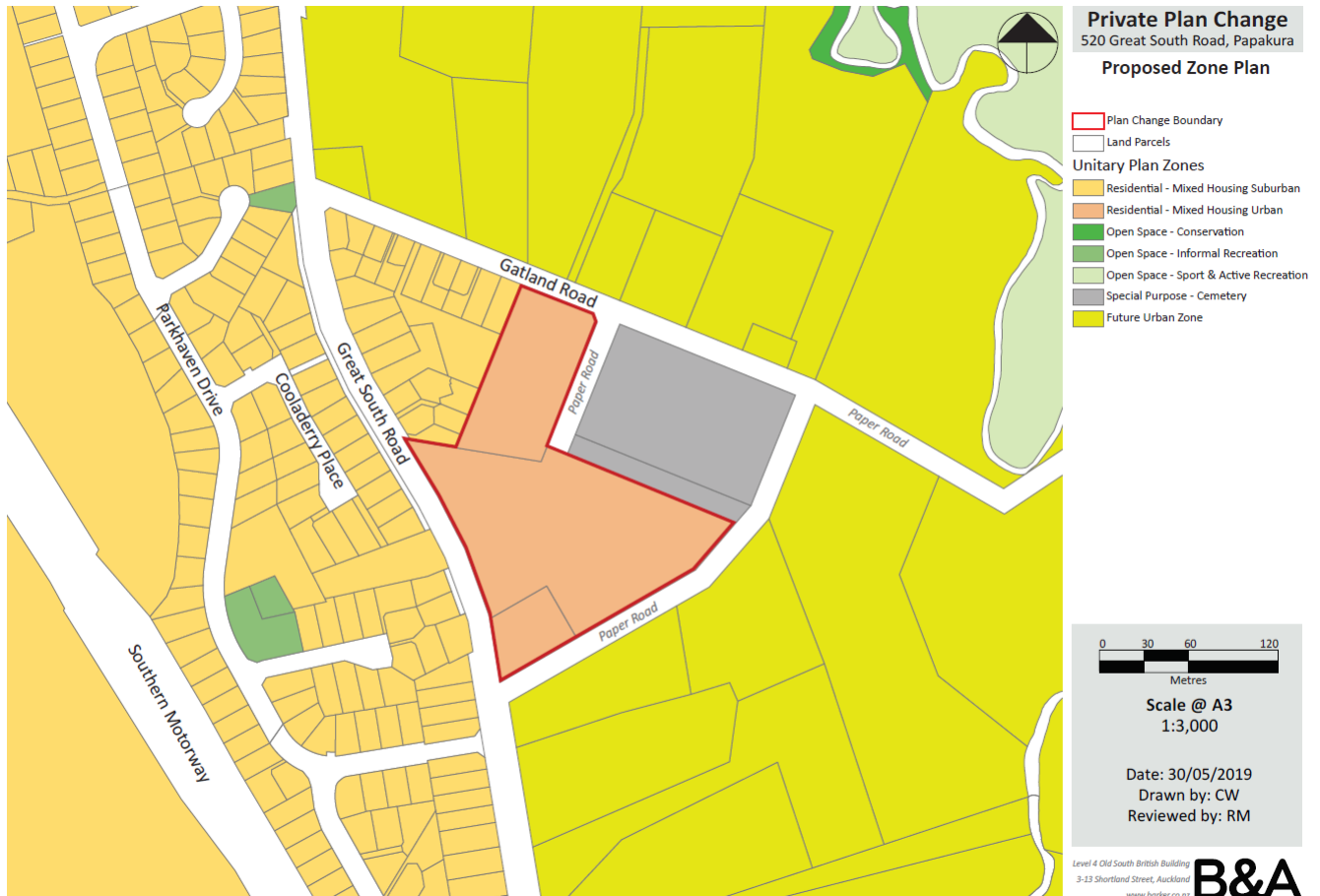
³ Consent ref: BUN60356792

⁴ Consent ref: BUN60336702

Private plan change content

17. The plan change request is set out in Attachment A. The proposed plan change seeks to rezone 4.63ha of land at 520 and 522 Great South Road and 21 Gatland Road from Future Urban Zone to Residential – Mixed Housing Urban Zone in the Auckland Unitary Plan Operative in Part 2016. No further precinct provisions, overlays or controls are sought. The zoning sought by the plan change is shown in **Figure 3** below:

Figure 3: Proposed zoning sought under plan change request



18. The objective of the plan change, as stated by the applicant is to:
- apply an urban residential zoning to 4.6268 hectares of Future Urban zoned [land] in Papakura, consistent with the Council's Drury-Opāheke Structure Plan.⁵*
19. The applicant has provided the following information to support the plan change request:
- Private plan change request, including drafted changes to the Auckland Unitary Plan
 - Section 32 evaluation report
 - Specialist reports:
 - Urban design report
 - Transport assessment
 - Stormwater management and flooding assessment
 - Engineering and infrastructure report

⁵ p.8 Section 32 Assessment (Attachment A)

- Geotech report
- Regional Policy Statement objectives and policies assessment

Timeframes

20. 520 Great South Road Limited lodged the private plan change request on 5 February 2020.
21. Further information was sought on 6 April 2020⁶ and provided on 17 June 2020.
22. Council is required to decide how the private plan change request is processed within 30 working days of the latest date specified above. That period ends on 28 July 2020.

Decision-maker

23. The Council delegated⁷ to Plans and Places' tier four managers the authority to make decisions how to process private plan change requests. A Unit Manager can decide under clause 25, Schedule 1, RMA, how council will process this private plan change request.

Tātaritanga me ngā tohutohu Analysis and advice

Statutory context: Resource Management Act 1991

24. Any person may request a change to a district plan, a regional plan or a regional coastal plan.⁸ The procedure for private plan change requests is set out in Part 2 of Schedule 1, RMA. The process council follows as a plan-maker is adapted,⁹ and procedural steps added¹⁰ including the opportunity to request information.
25. Council must decide under clause 25 which is the most appropriate processing option for each private plan change request. In making this decision council must have particular regard to the applicant's section 32 evaluation report when deciding. The clause 25 decision is the subject of this report and clause 25 is set out in full in Attachment B.
26. I consider that the applicant has provided sufficient information for the request to be considered. I consider that the insufficient information grounds for rejection in clause 23(6) are not available in this instance.
27. I evaluate the options available under clause 25 in the next sections of this report. I have had particular regard to the applicant's section 32 evaluation report in undertaking the assessment of clause 25 options.

Options available to the council

Option 1: Adopt the request, or part of the request, as if it were a proposed plan change made by the council itself

28. Council can decide to adopt the request, or part of the request. Council would then process it as though it were a council-initiated plan change.
29. If the plan change
 - a) includes a rule that protects or relates to any natural or historical resource specified in section 86B RMA, or
 - b) provides for or relates to aquaculture activities

⁶ Under Clause 23 to Schedule 1 Resource Management Act 1991

⁷ Auckland Council Combined Chief Executive's Delegation Register (updated June 2019). All powers, functions and duties under Schedule 1 of the Resource Management Act 1991, except for the power to approve a proposed policy statement or plan under clause 17 of Schedule 1, are delegated to the relevant Tier 4 Manager

⁸ Clause 21, Schedule 1, Resource Management Act 1991.

⁹ Part 1 Schedule 1 applies, as modified by clause 29 Part 2 Schedule 1, Resource Management Act 1991.

¹⁰ Part 2 Schedule 1 Resource Management Act 1991.

it may be appropriate for the plan change to have legal effect from notification. If there is a proposed rule of this kind, immediate legal effect could be desirable to prevent a “goldrush” of resource (over)use that could occur until the plan change is made operative.

30. Only a council initiated, or an adopted private plan change, could have immediate legal effect.
31. The plan change does not include any proposed rule that would protect, or relate to, any natural or historical resource specified in section 86B. The private plan change is unrelated to aquaculture activities. It is unnecessary to adopt the private plan change request to enable a rule to have immediate legal effect.
32. The request does not address a gap in the Auckland Unitary Plan, introduce a new policy direction, nor does the private plan change have broad application by seeking to change provisions that apply across the region.
33. Council meets all costs of processing the plan change if the request is adopted. Council should not carry these costs if the request is primarily of direct benefit to the applicant, rather than the wider public, or have other public policy benefits. The request is a site-specific proposal, and does not relate to the provision or development of public land. The most immediate or direct benefit, if any, is to the applicant.
34. The applicant did not request that council adopt the private plan change request.
35. I recommend the private plan change request not be adopted.

Option 2 – Reject the request, in whole or in part

36. Council has the power to reject a private plan change request, in whole or in part, in reliance on one of the limited grounds set out in clause 25(4).
37. The grounds for rejection under clause 25(4) are as follows:
 - a) the request or part of the request is frivolous or vexatious; or
 - b) within the last two years, the substance of the request or part of the request;
 - i. has been considered, and given effect to, or rejected by, the local authority or the Environment Court; or
 - ii. has been given effect to by regulations made under section 360A; or
 - c) the request or part of the request is not in accordance with sound resource management practice; or
 - d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or
 - e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than two years.

Is the request frivolous or vexatious?

38. The private plan change request is not considered frivolous or vexatious. The land subject to the private plan change request is zoned for future urban development, and the private plan change is supported by technical assessments on relevant matters including transport, urban design and stormwater management.
39. The applicant is not acting in bad faith by lodging a private plan change request. The applicant is not requiring council to consider matters in this process that have already been decided or the subject of extensive community engagement or investment.
40. The applicant advises that the objective of the plan change is to apply an urban residential zoning to Future Urban zoned land in Papakura, consistent with the Council’s Drury-Opāheke Structure Plan. The request includes a section 32 evaluation report which is supported by specialist assessments on relevant matters, including transport, urban design and stormwater management. I consider the request is not frivolous as the private plan change:

- a) was considered thoroughly in the application materials
 - b) is supported by expert independent opinion, and a section 32 analysis, and
 - c) cannot be said to have no reasonable chance of succeeding.
41. The applicant is not acting in bad faith by lodging a private plan change request. The applicant is not requiring council to consider matters in this process that have already been decided or the subject of extensive community engagement or investment. Accordingly I do not consider the private plan change request to be vexatious.
42. I recommend the private plan change request not be rejected on this ground.

Has the substance of the request been considered and been given effect, or rejected by the council within the last two years?

43. As outlined in paragraph 13 of this report, the Drury-Opāheke Structure Plan was adopted by Council in August 2019. The structure plan addresses matters of substance similar to the plan change request, by identifying indicative land use zoning patterns and supporting infrastructure. This includes the plan change land being considered. It does not however consider the timing or sequencing of development.
44. The substance of the private plan change request has been considered by the Council within the last two years. Therefore, the Council has grounds to reject the request under Clause 25(4)(b).
45. However, the focus of the structure plan is to identify how urban growth will be provided for at a strategic level, rather than enable the immediate development of the land for urban activities. Therefore, whilst the substance of the request has been considered (broadly speaking), it has not yet been given effect to.
46. Additionally, the private plan change request is consistent with the aspirations of the structure plan, which identifies the plan change land as Mixed Housing Urban.
47. Therefore, I recommend the private plan change request not be rejected on this ground.

Has the substance of the request been given effect to by regulations made under section 360A?

48. Section 360A relates to regulations amending regional coastal plans pertaining to aquaculture activities. The site is not within the coastal marine area, or involve aquaculture activities, and therefore section 360A regulations are not relevant.
49. I recommend the private plan change request not be rejected on this ground.

Is the request in accordance with sound resource management?

50. The term 'sound resource management practice' is not defined in the RMA.
51. In the recent Environment Court decision **Orakei Point Trustee v Auckland Council** [2019] NZEnvC 117, the Court stated:
- “[13] What *not in accordance with sound resource management practice* means has been discussed by both the Environment Court and High Court in cases such as **Malory Corporation Limited v Rodney District Council** (CIV-2009-404-005572, dated 17 May 2010), **Malory Corporation Limited v Rodney District Council (Malory Corporation Ltd v Rodney District Council** [2010] NZRMA 1 (ENC)) and **Kerikeri Falls Investments Limited v Far North District Council (KeriKeri Falls Investments Limited v Far North District Council**, Decision No. A068/2009)
- [14] Priestley J said in **Malory Corporation Limited v Rodney District Council** (CIV-2009-404-005572, dated 17 May 2010, at 95) that the words *sound resource management practice* should, if they are to be given any coherent meaning, be tied to the Act's purpose and principles. He agreed with the Environment Court's observation that the words should be limited to only a coarse scale merits assessment, and that a private plan change which does not accord with the Act's purposes and principles will not cross the threshold for acceptance or adoption (CIV-2009-404-005572, dated 17 May 2010, at 95)

[15] Where there is doubt as to whether the threshold has been reached, the cautious approach would suggest that the matter go through to the public and participatory process envisaged by a notified plan change (Malory Corporation Ltd v Rodney District Council [2010] NZRMA 1 (ENC), at para 22).”

52. I understand the consideration of this ground should involve a coarse assessment of the merits of the private plan change request - “at a threshold level” - and take into account the RMA’s purpose and principles – noting that if the request is accepted or adopted the full merits assessment will be undertaken when the plan change is determined.
53. The RMA’s purpose is set out at section 5 and the principles are set out at sections 6 to 8. Regarding these RMA Part 2 matters, the private plan change . . .
54. In terms of land use, the private plan change request is aligned with the Drury-Opāheke Structure Plan.

Transport and funding

55. The plan change request, if approved, would enable residential development to occur in advance of transport infrastructure identified by NZUP and SGA being delivered within the Drury-Opāheke area.
56. This includes the following transport projects earmarked for funding within the NZUP:
- a) rail stations at Drury West and Drury East, construction commencing 2023;
 - b) electrification of the rail tracks from Papakura to Pukekohe, commencing late 2020; and
 - c) improvements to State Highway 1 between Papakura and Drury South, to be completed by 2025.
57. This also includes a number of transport projects identified within the integrated transport assessment prepared by SGA in support of the Drury-Opāheke Structure Plan, which include:
- a) Upgrades to Great South Road “*to be sequenced first and progressively upgraded over time, with bus priority to enable frequent bus services initially, with further improvements occurring as parallel routes are developed to increase overall north-south capacity*”;
 - b) Provision of a new arterial (AR10) between Papakura industrial area and Waihoehoe Road. This may push back the need for the Papakura-to-Waihoehoe Road section of Mill Road given that that the additional arterial will provide north-south capacity for all modes whilst facilitating development access;
 - c) Upgrades to Opāheke/Ponga and Waihoehoe Roads in a west-to-east direction along with development, and connecting Waihoehoe Road with Fitzgerald Road and Drury South roads for bus circulation; and
 - d) Waihoehoe Road

These projects are not yet funded by Council. Whilst the Drury-Opāheke Structure Plan integrated transport assessment does not identify particular sequencing or timing of infrastructure delivery, it does reference the 2028-2032 period outlined in the FULSS as being the driver of such staging.

58. Therefore, on the basis of the plan change becoming operative in early 2021 and construction beginning in 2021, residential development could occur on the land between 2 and 12 years prior to the full extent of transport infrastructure in the immediate area being delivered.
59. In making a determination on sound resource management practice, the key outstanding matter for consideration is the extent to which the transport effects of the plan change can be accommodated in advance of such network infrastructure being developed.

60. To this end, the applicant's analysis¹¹ indicates that the traffic generated by the plan change can be accommodated on the surrounding network whilst maintaining an acceptable level of service on the network. Therefore, the applicant considers that the plan change land does not rely on more comprehensive upgrades to the network.
61. Flow Transportation Specialists Ltd have reviewed the plan change application for sufficiency and accuracy of information on behalf of Council and have not identified any fundamental errors in how the applicant has reached this conclusion.
62. For the purposes of a Clause 25 assessment, Auckland Transport have provided the following views on the plan change:

Auckland Transport recognises that this application site is not sequenced for development until the first half of decade 2 (2028 – 2038) under the Future Urban Land Supply Strategy. Auckland Transport has concerns over the provision of necessary infrastructure to support the urbanisation of this and adjoining sites

However, AT have not identified what specific projects are fundamental to support the development of the plan change land.

63. A further consideration is that whilst urban development ahead of Council's programme (as sequenced in the FULSS) is possible, earlier than planned urbanisation raises questions about the extent to which the Regional Policy Statement directives to ensure integration of development with infrastructure provision can be given effect to. In view of significant pressures on Council funding for growth-related infrastructure across the region, consistency with the RPS will require a much larger proportion of infrastructure upgrade and expansion costs to be met by developers (and recouped from future land owners) than might otherwise be the case. Growth pressures and existing commitments, plus the impact of Covid 19 on revenues mean that the Council cannot easily redirect funding from elsewhere to fund the infrastructure required to support these private plan change requests. In particular is the risk that funding would need to be re-directed from supporting brownfields redevelopment – a key outcome of the Auckland Plan and a fundamental building block of the AUP's approach to providing for growth pressures.
64. This is considered to be a potential ground for rejection of the plan change request. Whilst the plan change land is contiguous to existing urban areas and established transport infrastructure, the early release of this land (compared with the FULSS sequencing) and its surrounds may compel funding to be directed to the improvement of Great South Road to accommodate an FTN network. However, this matter is more relevant to a substantive assessment of the plan change (through submissions and hearings) rather than a coarse merits assessment, given existing roading and public transport infrastructure is available to service the land (and therefore there may be no immediate need for improvements to support the early urbanisation of this land), and that funding to other key transport projects in Drury has been brought forward by the NZUP programme.
65. Taking into account the conclusions reached by the applicant's transport specialists, the views of Flow acting on behalf of Council, and the pipeline of transport infrastructure investment signalled particularly within the NZUP programme, I consider that at a coarse scale, the plan change should not be rejected on the grounds of sound resource management practice in relation to transport matters.

Flooding and stormwater

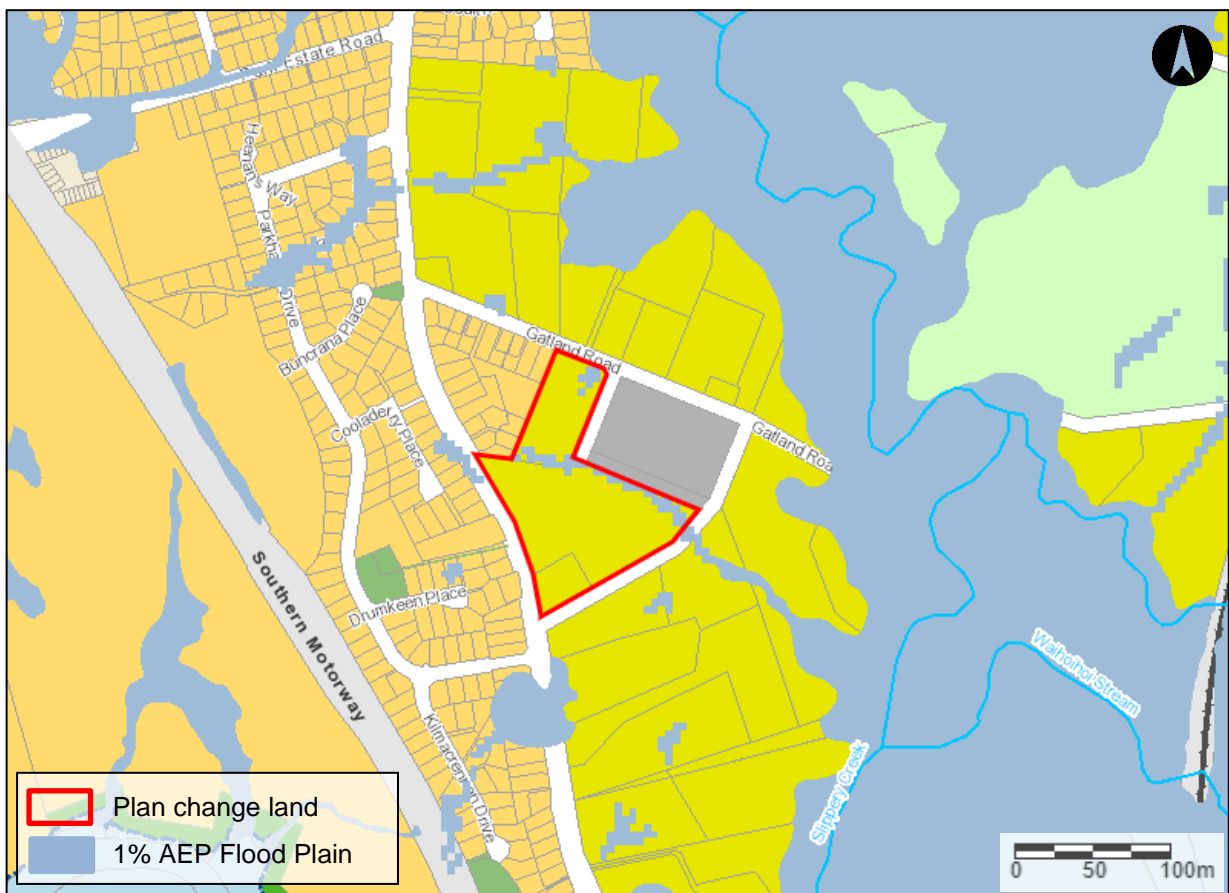
66. Flooding is identified within the FULSS and Drury-Opāheke Structure Plan as a significant constraint within the wider Opāheke area, and in particular the land adjacent to Otuwairoa / Slippery Creek, close to the plan change land. However, the plan change area is largely

¹¹ Via the Transport Assessment prepared by Traffic Planning Consultants Ltd and dated 27 June 2019

located outside of Otuwairoa / Slippery Creek and associated areas subject to flood risk (refer to **Figure 4** below).

67. An intermittent or permanent stream¹² and associated flood plain bisects the site. However, potential flooding effects that could arise can be addressed through site design and mitigations by way of resource consent applications¹³. Given the discrete size of the size and location in relation to major flood plains, the development of the plan change ahead of the FULSS sequencing will not preclude catchment or inter-catchment wide solutions required to urbanise the more marginal flood-prone areas of Opāheke.
68. In relation to stormwater, the applicant has submitted a Stormwater Management Plan ('SMP') indicating that there are a variety of mitigations available to address stormwater quality and hydrology. The applicant considers that the Auckland Unitary Plan contains provisions to ensure these mitigations are provided in accordance with the SMP.
69. Healthy Waters views are addressed at paragraph 101 of this report. In summary, Healthy Waters are satisfied that flooding and stormwater mitigations are available, subject to the findings of the applicant's SMP being tested through the submissions and hearings stages of the plan change process.
70. Therefore, I consider that at a coarse scale, the plan change should not be rejected on the grounds of sound resource management practice in relation to flooding and stormwater matters

Figure 4: Map showing 1% AEP Flood Plain and rivers in relation to the plan change land



Wastewater and water supply infrastructure

¹² Yet to be assessed and classified

71. The FULSS identifies bulk wastewater infrastructure as being critical to the full build out of the Drury-Opāheke area. This includes the augmentation of the South and Southwestern Interceptors across the future urban land.
72. However, the site, being contiguous to the existing urban edge, can be serviced by the existing reticulated network, rather than relying on these wider network improvements. Whilst Veolia Ltd as the wastewater network operators in this area have identified network capacity constraints associated with the plan change, these are proposed to be addressed through the resource consent current under consideration by Council, through the provision of a new public reticulated network and pump station.
73. The Drury-Opāheke Structure Plan identifies an indicative bulk wastewater network required to service the full build out of the structure plan area. The indicative network is not located on the plan change land, and therefore the development of this land is unlikely to obstruct the delivery of future bulk wastewater infrastructure in Drury-Opāheke.
74. Therefore, I consider that at a coarse scale, the plan change should not be rejected on the grounds of sound resource management practice in relation to wastewater and water supply matters.

Other matters

75. The applicant's report indicated that there is sufficient open space, amenities and social facilities to support the development of the plan change land. In reference to open space, the applicant's analysis indicates that the Opāheke Reserve and neighbourhood park at Drumkeen Place would service the Mixed Housing Urban zone in accordance with Council's Open Space Provision Policy 2016. Council's Parks Planning team have advised that "*the surrounding existing and planned open space will meet Council's open space provision targets*". The applicant has also noted the presence of schools (Drury School and Pinehill College) and the existing Drury and Papakura Centres that would serve the plan change land.
76. There is risk that upon acceptance of this request, further plan changes will be lodged with Council to develop further areas within the Drury-Opāheke area ahead of the FULSS sequencing, and subsequently infrastructure provision and land use integration will be difficult to coordinate. However, were this to happen, it is anticipated that future plan change requests within Drury East will likely be confined to the future urban areas contiguous with the existing urban area (and therefore not reliant on bulk network infrastructure being established) and outside of the Otuwairoa / Slippery Creek flood plain.
77. In respect of integration within the wider Future Urban Zone area, the plan change request includes an indicative neighbourhood master plan that identifies surrounding land uses, infrastructure and amenities.

Sound resource management conclusions

78. Having reviewed the applicant's planning and specialist reports, undertaken a coarse scale merits assessment of the private plan change request, and taken the purpose and principles of RMA into account, the private plan change request is considered to be in accordance with sound resource management practice for the purposes of consideration under Clause 25(4)(c), Schedule 1.
79. I recommend the private plan change request not be rejected on this ground.

Would the request or part of the request make the policy statement or plan inconsistent with Part 5 of the RMA?

80. The most relevant consideration is whether the plan change would give effect to the RPS component of the Auckland Unitary Plan.
81. Based on a preliminary assessment of the RPS, and subject to being tested fully through the submissions and hearing process, the plan change request would not automatically make the Auckland Unitary Plan inconsistent with Part 5 of the RMA, because:

- a) the Plan Change area is contiguous with the existing urban area and development can likely be serviced by existing infrastructure, open space and social facilities;
- b) the surrounding road network can operate safely and efficiently with the rezoning in place, there is existing public transport serving the site and development of the site would not preclude any future transport upgrades;
- c) the zoning seeks to efficiently utilise the physical land resource, and offers the potential for a greater range of housing types, contributing to greater housing choice in an accessible location;
- d) the recreational needs of future residents within the Plan Change area are likely to be met through existing local open spaces¹⁴;
- e) the Plan Change has been informed by an infrastructure assessment which indicates that the development enabled by the proposed rezoning can connect to existing infrastructure networks, and does not rely on more comprehensive upgrades to the network; and
- f) specific mitigation measures to natural hazard risk from flooding are required under the Auckland-wide provisions and will be considered as part of a future resource consent process.

82. Other considerations include the consistency with the:

- Auckland Plan 2050
- National Policy Statement on Urban Development Capacity 2016

The plan change request is considered to be broadly consistent with these plans and policies, although again this would need to be confirmed through the submissions and hearings process.

83. I recommend the private plan change request not be rejected on this ground.

Has the plan to which the request relates been operative for less than two years?

84. The plan provisions of the AUP relevant to this request were made operative on 15 November 2016. The provisions have therefore been operative for more than two years.

85. I recommend the private plan change request not be rejected on this ground.

Option 3 – Decide to deal with the request as if it were an application for a resource consent

86. The council may decide to deal with the request as if it were an application for a resource consent and the provisions of Part 6 would then apply accordingly.

87. As discussed earlier in this report, there are currently resource consent applications lodged with Council for the build out of most of the plan change area (4.2ha of the 4.63ha). However, the operative policy framework¹⁵ anticipates urban development being preceded by a plan change process, and such, there is no certainty that these applications will be considered to be consistent with the policy direction of the AUP(OP).

88. Therefore, I recommend the private plan change request not be dealt with as if it were an application for a resource consent.

Option 4 - Accept the private plan change request, in whole or in part

89. Council can decide to accept the request in whole, or in part. If accepted, the plan change cannot have legal effect until it is operative. It is considered that the private plan change

¹⁴ Including Opāheke Reserve, 41ha suburban park located 600m from the plan change land, and Drumkeen Place, a neighbourhood park located 100m from the plan change area

¹⁵ The RPS, Future Urban Zone, and Appendix 1 within the AUP(OP)

request should be accepted in whole and that there is no reason to accept (or reject) only parts of the request.

90. There isn't a demonstrable need for any rule proposed by the plan change to have immediate legal effect, and therefore adoption is not required.
91. The private plan change mechanism is an opportunity for an applicant to have their proposal considered between a council's ten-yearly plan review cycle. The subject matter of this private plan change request is not a priority matter in Plans and Places' work programme, and is not presently being considered. The private plan change process is a means by which this matter can be considered before the next plan review.
92. If the private plan change is accepted the matters raised by the applicant can be considered on their merits, during a public participatory planning process.
93. The applicant did not request that council adopt the private plan change request.

Conclusion: options assessment

94. I have assessed the private plan change request against the options available and the relevant matters. These include clause 25 Schedule 1 matters, having particular regard to the applicant's section 32 evaluation, and case law¹⁶ that provides guidance on the statutory criteria for rejection of a private plan change request. I recommend the private plan change request is accepted.

Tauākī whakaaweawe āhuarangi

Climate impact statement

95. Council declared a climate emergency in Auckland, in June 2019. The decision included a commitment for all council decision-makers to consider the climate implications of their decisions. In particular, consideration needs to be given in two key ways:
 - a) how the proposed decision will impact on greenhouse gas emissions and the approach to reduce emissions
 - b) what effect climate change could have over the lifetime of a proposed decision and how these effects are being taken into account.
96. The decision whether to adopt, accept, reject or deal with the private plan change request is a decision relative to those procedural options, rather than a substantive decision on the plan change request itself. The clause 25 decision is unrelated to any greenhouse gas emissions. The decision requested is a decision of short duration. Climate impacts can be considered in the future hearing report on the private plan change request, and any submissions received.

Ngā whakaaweawe me ngā tirohanga a te rōpū Kaunihera

Council group impacts and views

97. Comment has been sought from Auckland Transport and Veolia Limited on the proposed plan change.
98. For the purposes of a Clause 25 assessment, Auckland Transport have commented as follows:

Auckland Transport recognises that this application site is not sequenced for development until the first half of decade 2 (2028 – 2038) under the Future Urban Land Supply Strategy. Auckland Transport has concerns over the provision of necessary infrastructure.

As outlined earlier in this report, the plan change applicant has indicated that traffic arising from the plan change can be accommodated on the surrounding network. Further, the appropriateness of this land being made development-ready prior to network upgrades

¹⁶ Malory Corporation Limited v Rodney District Council [2010] NZRMA 392 (HC)

signalled in the Drury-Opāheke Structure Plan and identified in the NZUP programme occurring can be assessed through the submission and hearing processes for this plan change.

99. Veolia Ltd have noted that:

At present, there is insufficient capacity to service the proposed development. Upgrades to the downstream gravity wastewater network as well as pump station and storage will be required. Water network upgrades may also be required

The plan change applicant has acknowledged capacity constraints within the wastewater and water supply networks and has proposed to address these primarily through the resource consents currently under consideration by Council.

100. Both Auckland Transport and Veolia Limited reserve the right to make a submission on the plan change upon notification.

101. Healthy Waters have provided input into the plan change request and resource consent application. They are generally satisfied that there are stormwater and flooding mitigations available, and that the Stormwater Management Plan submitted by the plan change applicant enables these matters to be considered by Council through the resource consent applications currently under consideration. However, this is subject to the plan change and SMP being reviewed in detail at the submission and hearings stage.

102. Council's Parks Planning team have provided comments on the plan change¹⁷, which are summarised below:

- a) there are no issues with there being no recreational open space provided within the private plan change subject site, and the surrounding existing and planned open space will meet Council's open space provision targets;
- b) the drainage reserve indicated (following the watercourse to the south of Papakura South Cemetery) does not meet Council's open space policy requirements with regards to recreation; and
- c) the pedestrian cycling connection opportunity identified (as part of the wider neighborhood analysis undertaken by the applicant) on the boundary of the site with the Papakura South Cemetery is supported by Parks Planning to provide a link from the site to the future esplanade network that will connect into the Slippery Creek Esplanade Reserve.

In relation to point (b), the plan change does not propose any open space zonings, but does indicate a stormwater management area in this location in the applicant's urban design assessment. The merits of establishing a drainage reserve in this location can be considered in detail through the plan change and resource consent application processes.

Ngā whakaaweawe ā-rohe me ngā tirohanga a te poari ā-rohe **Local impacts and local board views**

103. Local boards' views are important in Auckland Council's co-governance framework. The views of the Papakura Local Board will be sought on the content of the private plan change request after the submission period closes. All formal local board feedback will be included in the hearing report and the local board will present its views to hearing commissioners, if the local board chooses to do so. These actions support the local board in its responsibility to identify and communicate the interests and preferences of people in its area, in relation to the content of Auckland Council plans.

104. Local board views have not been sought on the options to adopt, accept, reject or deal with the private plan change request as a resource consent application. Although council is required to consider local board views prior to making a regulatory decision, that requirement applies when

¹⁷ In a memo prepared by Maylene Barrett, Principal Specialist Parks Planning, dated 20 May 2020

the decision affects, or may affect, the responsibilities or operation of the local board or the well-being of communities within its local board area. The clause 25 decision does not affect the Papakura Local Board's responsibilities or operation, nor the well-being of local communities.

Tauākī whakaaweawe Māori

Māori impact statement

Consequence of clause 25 options for future consultation

105. If council accepts a private plan change request, it is not required to complete pre-notification engagement with iwi authorities. If the council accepts the request and subsequently notifies it, iwi authorities have the opportunity to make submissions. No changes can be made to the private plan change prior to notification.
106. If council adopts a private plan change the same consultation requirements apply as though the plan change was initiated by council: consultation with iwi authorities is mandatory prior to notification and changes can be made to the plan change prior to notification. Iwi authorities have the opportunity to make submissions after notification.
107. None of the clause 25 options trigger any signed mana whakahono a rohe (iwi participation arrangement).

Substance of private plan change request

108. The proposed plan change does not relate to Māori land or Treaty Settlement Land, nor does it relate to any identified Sites of Significance to Mana Whenua within the Auckland Unitary Plan.

Record of applicant's consultation

109. The applicant has engaged with the following iwi groups who have expressed an interest in the proposal:
 - a) Ngati Te Ata;
 - b) Ngai Tai Ki Tamaki;
 - c) Ngati Tamaoho.
110. The applicant advises that consultation with these iwi groups is on-going and the outcome of these discussions will be provided to Council in due course.

Ngā ritenga ā-pūtea

Financial implications

111. Accepting the private plan change requests has no direct financial implications for the Council as the costs associated with processing them under the RMA are able to be recovered from the applicant.
112. However, if accepted and ultimately made operative, the infrastructure required to support the development enabled will have implications for the budgets and long-term planning of various Council departments that provide infrastructure (e.g. stormwater, parks and community facilities) as well as Auckland Transport and Watercare.
113. If the request is adopted, council would pay all costs associated with processing it. Plans and Places department would be required to cover this unbudgeted expenditure; there would be less funding available to progress the department's work programme.
114. If the request is accepted or, if the request is dealt with as a resource consent application, the applicant would pay all reasonable costs associated with processing it on a user-pays basis.

Ngā raru tūpono me ngā whakamaurutanga Risks and mitigations

115. The key RMA-related risk associated with accepting the private plan change requests is that this decision could see other private plan change requests come forward ahead of the timing in the FULSS.
116. Additionally, an applicant may appeal to the Environment Court a decision to accept, adopt or reject a private plan change request, or deal with the private plan change request as if it were an application for a resource consent¹⁸. However, accepting this plan change request is considered to carry a legible risk of legal challenge, given that this is in line with the applicant's request.
117. I recommend that all of the private plan change request is accepted. The applicant requested the private plan change be accepted. The risk of a legal challenge by the applicant utilising the clause 27 appeal rights is negligible. No avenue for appeal would be available.
118. No substantial changes can be made to the private plan change request following the clause 25 decision. I have worked with the applicant on the plan change leading up to this clause 25 report.

Ngā koringa ā-muri Next steps

119. If accepted, the private plan change must be notified within four months of its acceptance.
120. A separate evaluation and decision will be required regarding extent of notification.
121. I will seek the views and preferences of the Papakura Local Board after submissions close for inclusion in the section 42A hearing report.
122. Council will need to hold a hearing to consider any submissions, and local board views, and a decision would then be made on the private plan change request in accordance with Schedule 1 of the RMA.

Clause 25 recommendation



123. This private plan change request requires decision-making pursuant to clause 25 of Part 2 of Schedule 1 of the Resource Management Act 1991, to determine whether it will be adopted, accepted, rejected or dealt with as if it were a resource consent application.
124. I recommend that the private plan change request from 520 Great South Road Limited to rezone land at 520 and 522 Great South Road and 21 Gatland Road, Papakura, be **accepted** under Clause 25(2)(b) of Schedule 1 of the Resource Management Act 1991 for the reasons set out in paragraph 7 of this report¹⁹.

Ngā kaihaina Signatories

Author	Sanjay Bangs Planner, Planning Central South
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¹⁸ Under Clause 27, Schedule 1 Resource Management Act 1991

¹⁹ Refer paragraph 8 of this report.

	 <p style="text-align: right;">Date: 27 July 2020</p>
Reviewer	<p>Craig Cairncross Team Leader Planning Central South</p>  <p style="text-align: right;">Date: 28 July 2020</p>

Clause 25 authority and decision

90. In accordance with Auckland Council Combined Chief Executives Delegation Register (updated June 2019), all powers, functions and duties under Schedule 1 of the Resource Management Act 1991, except for the power to approve a proposed policy statement or plan under clause 17 of Schedule 1, are **delegated** to Plans and Places Department Tier 4 Managers.
91. I have read the planner's report and recommendations on the private plan change request. I am satisfied I have adequate information to consider the matters required by the Resource Management Act 1991 and to make a decision under delegated authority.

Decision	I accept the private plan change request by 520 Great South Road Ltd under Clause 25 of Schedule 1 of the Resource Management Act 1991
Authoriser	<p>Celia Davison Unit Manager, Planning Central South</p>  <p style="text-align: right;">Date: 3 August 2020</p>

Instructions from Unit Manager

Instructions from Unit Manager to Planner

Following my decision under delegated authority you must:

1. Save (if electronic signatures used) or scan and save (if conventional signatures used) a copy of this report to the relevant modifications folder in the U drive.

2. Write to the applicant to advise of the decision. Use the Clause 25 letter to applicant template on Kotahi <https://acintranet.aklc.govt.nz/EN/departments/PlansandPlaces/Pages/Plan-Changes.aspx>
3. Email Unitary Plan inbox to record the clause 25 decision, and to provide sufficient information to update the Planning Committee. Complete the following information, then copy and paste in an email to unitaryplan@aucklandcouncil.govt.nz

Use subject line "Clause 25 info for inclusion in Planning Committee memo"

Plan change	Location	Plan change purpose	Decision	Decision date
PC insert name	2 Kakariki Street, Onehunga	Protect historic heritage values	Accepted	3 June 2020

Ensure you send the email to the Unitary Plan inbox promptly. The monthly info memo to the committee will be incomplete if you tarry.

Ngā tāpirihanga

Attachments

A Private plan change

B Clause 25 Schedule 1, Resource Management Act 1991

A Private plan change

B Clause 25 Schedule 1, Resource Management Act 1991

Cls 25 Local authority to consider request

- (1) A local authority shall, within 30 working days of—
- (a) receiving a request under [clause 21](#); or
 - (b) receiving all required information or any report which was commissioned under [clause 23](#); or
 - (c) modifying the request under [clause 24](#)—
- whichever is the latest, decide under which of subclauses (2), (3), and (4), or a combination of subclauses (2) and (4), the request shall be dealt with.
- (1A) The local authority must have particular regard to the evaluation report prepared for the proposed plan or change in accordance with [clause 22\(1\)](#)—
- (a) when making a decision under subclause (1); and
 - (b) when dealing with the request under subclause (2), (3), or (4).
- (2) The local authority may either—
- (a) adopt the request, or part of the request, as if it were a proposed policy statement or plan made by the local authority itself and, if it does so,—
 - (i) the request must be notified in accordance with [clause 5](#) or [5A](#) within 4 months of the local authority adopting the request; and
 - (ii) the provisions of [Part 1](#) or [4](#) must apply; and
 - (iii) the request has legal effect once publicly notified; or
 - (b) accept the request, in whole or in part, and proceed to notify the request, or part of the request, under [clause 26](#).
- (2AA) However, if a direction is applied for under [section 80C](#), the period between the date of that application and the date when the application is declined under [clause 77\(1\)](#) must not be included in the calculation of the 4-month period specified by subclause (2)(a)(i).
- (2A) Subclause (2)(a)(iii) is subject to [section 86B](#).
- (3) The local authority may decide to deal with the request as if it were an application for a resource consent and the provisions of [Part 6](#) shall apply accordingly.
- (4) The local authority may reject the request in whole or in part, but only on the grounds that—
- (a) the request or part of the request is frivolous or vexatious; or
 - (b) within the last 2 years, the substance of the request or part of the request—
 - (i) has been considered and given effect to, or rejected by, the local authority or the Environment Court; or
 - (ii) has been given effect to by regulations made under [section 360A](#); or
 - (c) the request or part of the request is not in accordance with sound resource management practice; or
 - (d) the request or part of the request would make the policy statement or plan inconsistent with [Part 5](#); or
 - (e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.
- (5) The local authority shall notify the person who made the request, within 10 working days, of its decision under this clause, and the reasons for that decision, including the decision on notification.

